

WEST VIRGINIA PYS 2022-2023 (MOD)

OVERVIEW

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

OPTIONS FOR SUBMITTING A STATE PLAN

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

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

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

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)
- Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)
- Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))
- Trade Adjustment Assistance for Workers programs (Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et seq.)
- Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))¹
- Reintegration of Ex-Offenders program (programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

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

HOW STATE PLAN REQUIREMENTS ARE ORGANIZED

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

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

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

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations.² States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations.

Paperwork Reduction Act: The Paperwork Reduction Act of 1995 (PRA) provides that an agency may not conduct, and no person is required to respond to, a collection of information unless it displays a valid OMB control number. Public reporting burden for this information collection is estimated to be 86 hours per state; including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Responding to this collection is required to obtain or retain the Federal grant benefit. In addition, responses to this information collection are public, and the agencies offer no assurances of confidentiality. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Labor, Office of Workforce Investment, and reference OMB control number 1205-0522. Note: Please do not return the completed plan to this address.

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

I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

A. WIOA STATE PLAN TYPE

The State of West Virginia has opted for a Combined Plan, with this modification.

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

COMBINED PLAN PARTNER PROGRAM(S)

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

B. PLAN INTRODUCTION OR EXECUTIVE SUMMARY

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

II. STRATEGIC ELEMENTS

The Unified or Combined State Plan must include a Strategic Planning Elements section that analyzes the State's current economic environment and identifies the State's overall vision for its workforce development system. The required elements in this section allow the State to develop data-driven goals for preparing an educated and skilled workforce and to identify successful strategies for aligning workforce development programs to support economic growth. Unless otherwise noted, all Strategic Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs.

A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

(TO BE PROVIDED SEPARATELY)

B. STATE STRATEGIC VISION AND GOALS

Governor Jim Justice understands the vital importance to West Virginia's employers of having a well-trained, workforce-ready labor force. He also is equally aware of the critical need to provide more individuals with the opportunity to be productive members of the state's labor force and, thereby, to improve the state's labor force participation rate.

As part of this, West Virginia is taking a comprehensive approach to improving workforce development. In 2019 Governor Justice signed an executive order establishing the Governor's Downstream Jobs Task Force to build an infrastructure for manufacturing operations in West Virginia to support the anticipated expansion of the petrochemical industry in the region. This

Appalachian Petrochemical Renaissance could lead to significant growth in the state with more than 100,000 steady jobs and \$28 billion in economic expansion for the State.

Jobs & Hope West Virginia was established by Governor Justice and the West Virginia Legislature to provide a comprehensive response to the substance use disorder crisis by providing residents with all-inclusive services to overcome barriers that have impeded their ability to obtain and maintain employment. While the target population is individuals in recovery from substance use disorder, Jobs & Hope West Virginia is open to any eligible participants who wish to eliminate barriers to employment. Jobs & Hope West Virginia plays a critical role in the recovery process as individuals rebuild their lives which ultimately leads to building and sustaining a healthy and thriving state economy. Those who participate in the program are assessed individually to identify employment and education goals, detect barriers, and receive support and assistance with reaching those goals and overcoming identified barriers. Participants have access to a wide array of services to include job placement, assistance securing transportation and childcare, reinstatement of driver's license, and if needed, assistance applying for expungement.

DHHR has petitioned the federal government to allow inclusion of Supported Employment services in the SUD waiver with the aim of supporting individuals through the process of obtaining and maintaining meaningful employment activities that improve chances of sustained recovery. Eligibility for Supported Employment services is specific to Medicaid members with a SUD diagnosis. Aside from clinical needs-based criteria that members must meet to be eligible for services, members must also be expected to benefit from the Supported Employment services they receive. To meet clinical eligibility criteria, an individual must have a diagnosed SUD and must additionally meet criteria for at least one set of risk factors targeting outcomes heavily influenced by social conditions, such as an inability to be gainfully employed for a substantial period due to impairment caused by SUD. Supported Employment services fall into two categories: pre-employment and employment sustaining services. These services will be adapted to meet individual needs, can be offered either individually or in small group settings.

In June 2021, Governor Justice established the Blue Ribbon Task Force on Aligning the Roles and Missions of the State Community and Technical College System and the Workforce Development System. The primary goal of the Governor's Blue Ribbon Task Force is to make it easier for West Virginia's citizens to enter and receive needed services from the state's workforce development system. Moreover, the Blue Ribbon Task Force seeks a stronger partnership between the workforce development system and West Virginia's community and technical colleges with the ultimate purpose of improving the state's labor force participation rate. Ultimately, the Blue-Ribbon Task Force envisions the development of this Combined State Plan for West Virginia that brings in additional workforce development partners such as Perkins V, Temporary Assistance for Needy Families (TANF), the Supplemental Nutrition Assistance Program (SNAP), and others to ensure that all West Virginians can benefit from WIOA services and enter or remain in the state's workforce.

Some of the overarching goals that are being considered, based on the observations of this Task Force, are: Cultivating State and Local Collaboration, Reinforcing effective policies and processes across and within each partner, Expanding cross training efforts between WDS partners, Utilization of Federal and State funds for maximum efficiency and taxpayer benefit, Using Data-Driven decision making, Strengthening existing partnerships and looking for opportunities for new partnerships, and Promoting a "No Wrong Door" approach to the WDS. Through these efforts, West Virginia can streamline and improve its current methodologies and eliminate redundancies, drive accountability, create efficiencies in budgets and expenditures, foster a

system of cooperation and competency, ensure inclusive and equitable services, and generally serve the citizenry and businesses of West Virginia in a more robust and effective manner.

In 2022, West Virginia will start Empower WV, a pilot program that will provide assistance for graduating high school seniors who do not have a plan after graduation. WorkForce West Virginia (WFWV) will work with local schools to identify those youth who will be served by this program. Participating individuals will be assessed for skills, interests, and work values. Using these assessments, WFWV staff will work with participants to determine their goals and provide a pathway to training or employment. Participants may be referred to partners in the workforce development system to assist with overcoming barriers to education or employment. Empower WV will begin as a pilot program in Workforce Development Region 3 and then expand statewide.

West Virginia's workforce development goals were developed to benefit all consumers of the West Virginia workforce development system, including veterans, individuals with disabilities, and individuals with other barriers to employment.

Goal 1: Maximize Efficiency of the Workforce Development System (WDS).

For WIOA to continue to be successful the workforce development system must be seamless, comprehensive, and accessible. Partners in the workforce development system will work together to maximize benefits to our customers and improve West Virginia's labor force participation rate.

Goal 2: Strengthen Relationships with Employers.

West Virginia's workforce development system will collaborate with employers utilizing a variety of methods to develop solutions to their workforce needs. This will enhance employment opportunities for all consumers.

Goal 3 Overcome Employment Barriers of Individuals.

The workforce development system will seek to identify employment barriers of individuals and develop solutions to help people enter or re-enter the state's labor force. The removal of barriers is a key component to improving West Virginia's labor force participation rate. This important goal is a direct focus of West Virginia's workforce development system to channel fiscal and human resources to assist individuals with overcoming barriers to employment.

Goal 4: Promote Career Pathways.

West Virginia will emphasize career pathways to assist individuals entering and moving within the labor force and to educate employers on the advantages of career pathways. In so doing, West Virginia will allow consumers, including veterans and individuals with barriers to employment, to better navigate with more flexibility in the timing of their educational, training, and employment needs.

Goal 5: Identify and Maximize Postsecondary and Employment Opportunities for Youth.

West Virginia's workforce development system will work to identify employment challenges faced by youth and provide access to postsecondary training/education and employment opportunities to improve our labor force participation rate. These efforts represent a channeling of personnel and fiscal resources to ensure younger consumers, including youth with disabilities and/or other barriers to employment, have an increased ability to achieve measurable skills

gains and recognized postsecondary credentials that will increase the quality of employment outcomes of youth consumers.

Goal 6: Align West Virginia's Labor Force Participation Rate with the National Labor Force Participation Rate.

West Virginia has the lowest Labor Force Participation Rate (LFPR) in the United States. Increasing this rate and reducing unemployment rate disparities for people with disabilities, both younger and older workers, and people with lower educational attainment would lead to measurable increases in the size of the state's available labor force. Helping minorities and other groups with barriers to employment is also critical to ensuring that West Virginia's employers are able to find workers and our economy is able to expand. Working to achieve this goal will reignite the focus of obtaining employment outcomes for West Virginia's Workforce Development System (WDS) consumers, including veterans and individuals with barriers to employment.

The state will assess the overall effectiveness of the workforce system and those educational programs that support and work with it based on their collective ability to produce career pathways leading to industry-valued, recognized postsecondary credentials and apprenticeship enrollments.

To match the supply and demand of the State's labor market, the West Virginia WDS gathers employment needs data provided by employers and subsequently generates and disseminates Labor Market Information (LMI), both at the statewide and local level. This LMI, published by WorkForce West Virginia (WFWV), provides short- and long-term projections of high demand occupations throughout West Virginia, at both the state and local level. From these projections, the State can recognize the credentials, certifications, and enrollments needed by its citizenry to achieve placement in the labor force in the coming years. Similarly, the State can identify the institutions of such enrollment and credentialing that the citizenry may utilize. One of the goals of West Virginia's WDS is to develop career pathways for individuals seeking employment, particularly in high demand occupations. To do this, it is vital for the WIOA core partners to provide the following to those individuals: LMI, including information regarding projected high demand occupations; an enhanced sense of informed choice regarding their opportunities for employment; and information about how to obtain qualifications for employment, especially in projected high demand occupations. The WDS will assess effectiveness in this goal by monitoring enrollment and achievement at institutions related to these projected high demand occupations and use this assessment to determine where any underserved areas lie.

An emphasis will be placed on high-demand, job-driven skills attainment. Specifically, the state will emphasize "demand-driven skills attainment" in the policies it sets pertaining to local and regional workforce plans. For example, in setting performance standards for Local Boards, the state will give great weight to WIOA performance measures related to program completion and credential attainment and will validate the labor market value of programs by examining the employment and wage outcomes of the individuals served.

The West Virginia Workforce Development Board (WVWFDB) will work with regionally organized Local Workforce Development Boards (LWDBs) and other state plan partners to determine the extent to which persons receiving training and education services aligned with regional industry needs are obtaining employment in occupations and sectors directly related to their programs of study.

Developing the capacity for tracking employment related to training and education programs of study will require the study and development of an operational plan for collecting the relevant information. The WVWFDB will work with all partners to build this capacity.

General Policy Framework for Program Alignment State Plan Policies

West Virginia will employ and will require state plan partners to adopt or participate in (to the extent appropriate for each program), seven policy strategies that frame, align, and guide program coordination at the state, local, and regional levels. These policies (discussed in further detail in the section on strategies, tactics, and resources) will include the following:

- **Sector Strategies:** Aligning workforce and education programs with leading and emergent industry sectors' skills needs.
- **Career Pathways:** Enabling of progressive skills development through education and training programs, using multiple entry and exit points, so that each level of skills development corresponds with a labor market payoff for those being trained or educated.
- **Regional Partnerships:** Building partnerships between industry leaders, workforce professionals, education and training providers, and economic development leaders to develop workforce and education policies that support regional economic growth.
- **Learn & Earn:** Using training and educational best practices that combine applied learning opportunities with material compensation while facilitating skills development in the context of actual labor market participation.
- **Supportive Services:** Providing ancillary services like childcare, transportation, and counseling to facilitate program completion by those enrolled in training and education courses.
- **Creating Cross-System Data Capacity:** Using diagnostic labor market data to assess where to invest, and also, the use of performance data to assess the value of those investments.
- **Integrated Service Delivery:** Braiding resources and coordinating services at the local level to meet client needs.

The State Plan provides the policy framework and direction for day-to-day operations of WIOA funded programs. The role of state agency and state department plan partners is to provide policy direction, program oversight, support, and technical assistance for and to local and regional service providers covered by the plan. State plan partners include the following:

- **WorkForce West Virginia (WFWV)**
 - Wagner-Peyser Services
 - Migrant and Seasonal Farmworker (MSFW) services
 - WIOA Adult Services
 - WIOA Dislocated Worker Services
 - WIOA Youth Services
 - Trade Adjustment Act (TAA)
 - Jobs for Veterans State Grant (JVSG)

- Unemployment Insurance (UI)
 - West Virginia Local Workforce Development Boards (LWDBs)
 - West Virginia Community and Technical Education (CTE)
 - West Virginia Community and Technical College System (CTCS)
 - West Virginia Adult Education
 - West Virginia Department of Education (WVDE)
 - West Virginia State Board of Education (SBE)
 - West Virginia Division of Rehabilitation Services (DRS)
 - West Virginia Department of Health and Human Resources (DHHR)
 - Governor’s Office of Business and Economic Development
 - Community Services Block Grant (CSBG)
 - Senior Community Service Employment Program (SCSEP)

Regional Plans and “Regional Sector Pathways”

Regional plans and partnerships required by WIOA will function under the State Plan as the primary mechanism for aligning educational and training provider services with regional industry sector needs.

Alignment at the regional level will be accomplished through the regional implementation of three of the seven policy strategies emphasized by the State Plan. These include sector strategies, career pathways, and organized regional partnerships. All three of these policies will be required under the regional planning guidance issued by the WVWFDB to LWDBs organized into the regional planning units required under WIOA Section 106.

A primary objective and requirement of regional plans will be to work with community colleges and other training and education providers, including the state’s Adult Education Block Grant regional consortia to build “regional sector pathway” programs, by which we mean career pathway programs that result in the attainment of industry-valued and recognized postsecondary credentials aligned to regional industry workforce needs. The WVWFDB, working alongside other state agencies, will provide technical assistance to regional partnerships of industry leaders, workforce professionals, and regional training and education providers to help align programs and services delivered with industry sector workforce needs.

Under the State Plan, the key regional partners involved with the development and implementation of regional plans will include the following:

- Industry sector leaders, associations, and business organizations
- Regionally organized LWDBs
- Local economic development organizations
- Regional consortia of community colleges

- Regional consortia of adult basic education providers (including both WIOA Title II and other state-funded basic education programs)
- Representatives of K-12 CTE programs are funded by either Perkins V funds or various state-specific CTE funding streams, when relevant county offices of education and other local educational agencies determine that participation will benefit the students participating in their CTE programs.

Regional efforts under WIOA are expected to build upon the WVWFDB's regional Sector Strategies Project discussed later in the State Plan.

Local Plans and American Job Centers of West Virginia

Under the State Plan, the purpose of local workforce plans and partnerships is to facilitate access to workforce services at the local level.

Local workforce development plans will ensure a baseline level of WIOA core program alignment compliant with federal regulations at the local level, in and through the American Job Centers (AJCs), the state's One-Stop system, so that program services are coordinated, and when appropriate, integrated to make accessible a menu of customizable services available to clients on the basis of client needs.

Under the State Plan and all relevant policies issued by the state concerning One-Stop design, operations, and partnerships, LWDBs will be directed to operate AJCs as an access point for programs that provide for "demand-driven skills attainment." From this perspective, AJCs will be operated as an "on ramp" or "gateway" to the "Regional Sector Pathways" programs either built-out or identified through the regional planning process described above.

West Virginia's AJCs will continue to provide the full menu of services that they have historically provided, and the AJCs will continue to function as labor exchanges but there will be much greater emphasis on treating AJCs as an access point for education and training services for those who want and need it. Further detail on AJC design and the operation of the AJCs is provided in the body of the State Plan.

C. STATE STRATEGY

West Virginia will continue an approach based on the needs of the individual as well as the needs of the employer. Our WDS must examine the needs of the employer, assess the skills and skill gaps of the workforce, and then create solutions to ensure maximum benefit to both customer groups.

Strategy 1.1: Core partners will collaborate to align program initiatives and processes.

Strategy 1.2: Ensure cross-training of all workforce development system partners.

Strategy 1.3: Communicate with all partners within the workforce development system.

Strategy 1.4: Maintain an integrated state management information system utilized by core partners.

Strategy 2.1: Partner with employers to identify workforce needs.

Strategy 2.2: Provide access to training programs that meet the needs of employers.

Strategy 3.1: Assess the needs of individuals seeking employment and/or training.

Strategy 3.2: Use the Employment First framework to ensure competitive, integrated employment as the priority option for individuals with significant disabilities.

Strategy 3.3: Provide access to training programs that meet the needs of individuals.

Strategy 4.1: Adhere to WIOA career pathways development.

Strategy 4.2: Enhance the current career pathways system.

Strategy 4.3: Educate individuals and employers to encourage career pathways in training and employment environments.

The Goals of West Virginia's Workforce Development System and our Strategies to Achieve these Goals

Goal 1: Maximize Efficiency of the Workforce Development System (WDS)

For WIOA to continue to be successful, the WDS must be seamless, comprehensive, and accessible. Partners in the WDS will work together to maximize benefits to our customers and improve West Virginia's Labor Force Participation Rate (LFPR).

Strategy 1.1: Core partners will collaborate to align program initiatives and processes.

Collaboration in West Virginia begins with regularly scheduled inter-agency meetings to discuss workforce development. The meetings consist of members from each agency subject to the reporting provisions of WIOA. Meetings with partners will promote program integration to eliminate duplication of efforts. The Interagency Collaborative Team (ICT) meets monthly while the West Virginia Workforce Development Board (WVWFDDB) meets quarterly to ensure effective alignment among our core partners.

Additionally, the WVWFDDB, the ICT and the Local Workforce Development Boards annually update Memoranda of Understanding (MOU) with all partners.

Further efforts aimed at collaboration with core partners are taking place at the regional level. For example, the Region 5 LWDB core and required partner staff jointly developed, and have in place, operational policies and procedures for regional AJCs that reflect an integrated system of performance, communications, and case management services. The Region 5 LWDB, core and required partner staff jointly developed, and have in place, a "Participant Common Referral" form and a "Participant Information Release" form for customer use at regional AJCs. These efforts have helped decrease duplication of efforts with participant data and information collection and will be similarly modeled at the State Level as part of the recommendations by the Governor's Blue Ribbon Task Force. All seven LWDBs conduct regular meetings with partners and have in place MOUs with core partners. The West Virginia Division of Rehabilitation Services (DRS) also maintains a presence with each of the seven LWDBs. DRS has signed MOUs and Infrastructure Funding Agreements (IFAs) with each LWDB. Each LWDB has a DRS representative who is active in the Board's activities and decision-making process.

DHHR is exploring options for transitioning the SNAP E&T program in the next federal fiscal year from its current voluntary program status to a mandatory program for all non-exempt Able-Bodied Adults Without Dependents (ABAWDs) statewide, with supervised job search as the primary qualifying activity under the program.

SNAP E&T case managers will assist clients with the job search process while providing additional supports to program participants to help them overcome barriers to employment. The state is working with other states that have successfully implemented this model to refine this plan for implementation in the upcoming federal fiscal year.

Strategy 1.2: Ensure cross-training of all workforce development system partners.

As data integration across the core partners' systems is being completed, training will be conducted for all staff that utilize the system. Staff will be able to access relevant consumer data shared from partner programs to coordinate and improve service delivery and employment outcomes for all WDS consumers.

Cross-training for partner agencies is conducted at the local level at each AJC across the state. Cross-training sessions typically include various community speakers who familiarize staff with community programs and services and grant funding available. As part of the implementation of the recommendations of the Governor's Blue Ribbon Task Force, further efforts will be taken among all partner agencies to communicate more effectively, expand services to citizens and businesses, and to provide comprehensive cross training to staff so there will be less duplication of effort, more efficient use of resources, and a more cohesive WDS overall. Some training elements that may be considered in these efforts could be: Comprehensive exposure to all partner services within the WDS, serving individuals with barriers to employment, and technical assistance on the State's Management Information System.

Strategy 1.3: West Virginia's Workforce Development System will communicate with all partners within the workforce development system.

Each of the seven Local Workforce Development Boards across West Virginia conduct regular monthly or quarterly meetings with all partners in the workforce development system. In addition, each LWDB maintains a website providing information on current workforce development activities. Daily communication takes place between each of the seven LWDBs and the partner agencies. The West Virginia Division of Rehabilitation Services (DRS) has maintained regular communication with WorkForce West Virginia (WFWV) to stay abreast of trends in employment, including changes in education and training requirements. This has been accomplished through regular meetings of WDS partners, written communications, teleconferences, and other media.

Strategy 1.4: West Virginia's workforce development system maintains an integrated state management information system utilized by core partners.

The development of a common Information Technology (IT) system to be used by core partners continues to be a priority for WFWV. Representatives from the core partners met on a regular basis to create a document outlining the required data elements to be shared and how those elements will be exchanged. WFWV modified the MACC system to extend the integrated registration and case management system to facilitate the sharing of customer information with DRS and Adult Education programs. Each partner can query data in real time to obtain information for the customer to review and correct as necessary prior to program enrollment. In addition, ongoing service delivery can be reflected in all partner systems by utilizing additional real time data exchanges. Each partner integrated the data from the other systems into their current case management system in ways that are familiar to their case managers, thereby reducing the need to retrain front-line staff.

West Virginia will continue to provide user training on the integrated state management information system to workforce development staff, both regionally and locally. Additionally, the State will use this information system to monitor and evaluate performance of core partner programs in relation to the six state goals.

Goal 2: West Virginia will strengthen our relationships with employers.

The West Virginia WDS will collaborate with employers utilizing a variety of methods to develop solutions to their workforce needs.

Strategy 2.1: Partner with employers to identify workforce needs.

The WVWFDB will set policies for providing services to employers through enhanced agency coordination. State agencies will act as intermediaries for organizing outreach to employers on a wider geographical basis than local regions.

West Virginia also enables employers to participate in business-education partnerships. These partnerships connect schools, employers, and community organizations with individuals to provide career-related experiences and employment opportunities such as soft skills development, internships, OJT, workplace shadowing, and career mentoring. West Virginia will continue to encourage employers to participate and serve on institutional and programmatic advisory committees to advise, develop, and recommend implementation of industry-driven credentials or degrees in programs of study identified as high demand.

Business Service Teams perform outreach to employers throughout West Virginia by visiting employers and providing them with a full range of information about the WDS. Further illustrating West Virginia's commitment to maintaining strong partnerships within the WDS, the BSTs consist of representatives from WFWV, Adult Education, DRS, the LWDBs and other entities. These partnerships on the BSTs allow the WDS to maximize the impact of employer visits and ensure that businesses are aware of all resources available through the WDS.

West Virginia also places great importance on helping individuals over the age of 55 to enter or remain in the workforce. Authorized through the Older Americans Act, the Senior Community Services Employment Program (SCSEP) works with non-profit community service companies and small governmental units to provide specially tailored job preparation for unemployed persons aged 55 and older. SCSEP training positions within the non-profit sector and small governmental units enhance the service capacity of those organizations.

Statewide efforts to connect with employers are mirrored at the regional level. The local workforce development boards (LWDBs) conduct comprehensive business visits and collaborate with economic development authorities, local chambers of commerce, community and technical education centers, and community and technical colleges.

Strategy 2.2: The West Virginia workforce development system will provide access to training programs that meet the needs of employers.

West Virginia maintains partnerships with employers, community colleges, secondary and post-secondary certificate granting schools, and LWDBs to continue micro-credentials that demonstrate skill development. This allows for the attainment of employability skills and measurable skill gains to align career pathways for individuals with barriers to employment, especially those with disabilities.

We also promote the development of Registered Apprenticeship programs that focus on non-traditional industries and occupations.

West Virginia continues to cultivate relationships with the secondary, postsecondary, and adult education systems to ensure that programs of study reflect employer needs.

Lastly, West Virginia encourages employers that receive state funds from economic development and similar programs to utilize the public workforce development system.

Goal 3: Overcome Employment Barriers of Individuals.

West Virginia strives to identify employment barriers of individuals and develop solutions. The removal of barriers is a key component to improving West Virginia's LFPR.

Strategy 3.1: Assess needs of individuals seeking employment and/or training.

West Virginia uses the Individualized Employment Plan (IEP) as the basis for the overall case management strategy to assess an individual's needs. The IEP is used to update strategies and activities as they occur and to document referral and contact information for services obtained from partner organizations. When reviewing the IEP, career coaches will document a participant's progress, the activities completed, benchmarks reached, and any other accomplishments.

Additionally, the Individualized Employment Plan should be:

- Developed in partnership with the participant and reflect attainable goals and objectives;
- Used as a tool that can and will change over time, as necessary, to meet the needs of the individual;
- Used as a roadmap to achieve measurable and attainable short-term and long-term goals; and
- Designed to reflect the individual's interests and incorporate career planning.

The provision of services should be a result of, and consistent with, the customer's assessment and IEP. Having a well-developed IEP and related documentation is required and is a fundamental part of case management. Once an IEP is developed and approved, it should be used in the ongoing process of monitoring and re-evaluating the participant's progress toward educational and occupational goals.

The IEP is a "living document" and is reviewed and updated as life changes occur – including the participant's interests and ambitions – as strategies are updated, as services are obtained from partner organizations, as activities are completed, and as goals are met and benchmarks are reached.

Through SCSEP, West Virginia's WDS provides specially tailored job preparation for unemployed persons aged 55 and older. Assessment of the individual's knowledge, skills, and work history and identification of his/her barriers to gainful employment provide the base upon which to guide the participant's development of an Individual Employment Plan (IEP). Participants are provided opportunities to upgrade job skills, expand work experience, engage in community services, improve reliable work practices, and pursue new vocations. Additionally, participants engage in activities to master their job-seeking skills, preparation for applications and presentation of their skills and knowledge.

Similarly, the West Virginia WDS assesses the needs of individuals with disabilities who are seeking employment or training. Counselors at the Division of Rehabilitation Services (DRS) meet with vocational rehabilitation (VR) applicants to discuss information related to

background, career aspirations, preferences, capabilities, limitations, accommodations, and other matters related to employment and/or independence. Upon entry into the VR program, the vocational goal, intermediate objectives, and the nature and scope of rehabilitation services to be included in the client's Individualized Plan for Employment (IPE) is determined. To prepare the IPE, the DRS counselor conducts a comprehensive assessment of the career goals, unique strengths, resources, priorities, interests, and needs (including the need for supported employment services) of an eligible individual in the most integrated setting possible, consistent with the client's informed choice.

DRS specializes in individualized service provision to people with disabilities who desire to work. These services include employability/soft skills, training sponsorship, vocational counseling and guidance, and job placement, among several others. DRS acknowledges that because of the individualized nature of services, some consumers will require the services of core partners or auxiliary partners to meet their additional needs. As appropriate, DRS will refer consumers to partners or provide joint services with partners to meet the needs of the workforce development system and its customers.

Finally, but just as importantly, West Virginia provides counseling to ascertain the service needs of individuals to determine the skills necessary for desired employment. We also coordinate cross-program services for job preparation activities to develop employability skills, adult basic education, and occupational training. When appropriate, individuals will be co-enrolled between two or more core programs to accomplish this goal. An effort will be made to expand the case management services of the Jobs & Hope personnel by providing training case managers to be familiar with the SNAP, TANF, federal and state financial aid, and the core workforce programs.

Strategy 3.2: West Virginia will use the Employment First framework to ensure competitive, integrated employment as the priority option for individuals with significant disabilities.

West Virginia officially adopted the Employment First Policy in 2021 after the passage and signing of House Bill 2290. The West Virginia Employment First Policy initiative is intended to promote the expectation that individuals with intellectual, developmental, and other disabilities are valued members of the workforce and can often meet the same employment standards, responsibilities, and expectations as other working-age adults when provided the proper education, reasonable accommodations, and support. The legislation also created the Employment First Taskforce and requires representatives from a number of agencies represented in the West Virginia Combined State Plan including DRS and WorkForce West Virginia. The Taskforce is charged with developing and implementing a state Employment First Policy. The Taskforce will continue to meet, plan, and develop policies and reports, as outlined in the legislation.

West Virginia's workforce development system strives to engage individuals with disabilities by offering realistic entry points into career pathways. Through integrated efforts, the core partners will increase awareness and access to services to individuals with disabilities. These efforts include maximizing resources, co-enrollment, cross referrals, outreach, and service delivery which will allow for successful employment outcomes.

Our workforce development system will ensure the implementation of the "Employment First" framework that is centered on the premise that all individuals, including individuals with significant disabilities, are capable of full participation in available employment activities and community life.

To achieve the Employment First goal, West Virginia's workforce development system will provide work experiences for individuals with significant disabilities that include full-time job opportunities paid directly by employers at prevailing wages with commensurate benefits occurring in a typical work setting. The employee with a disability will be able to interact continuously with co-workers who do not have disabilities and have the opportunity for advancement and job mobility. Moreover, West Virginia will mainstream job seekers with barriers to employment, especially those with disabilities, to the maximum extent possible by offering realistic entry points into career pathways and by ensuring that necessary supportive services are in place and coordinated across agencies, so that those individuals with the most significant barriers to employment are successful in accessing and navigating career pathways. When appropriate, job seekers will be co-enrolled between core and other partner programs in order to provide the most comprehensive services possible.

Examples of West Virginia's efforts to mainstream job seekers with significant disabilities include working with entities such as Job Squad and Pace to support the entry of persons with disabilities into the workforce through Transitional Job and on-the-job training (OJT) programs, including support services for those who have been assessed to need them.

Strategy 3.3: Provide access to training programs that meet the needs of individuals.

It is imperative that the WDS provides education and training for skills that lead to quality employment in high-demand jobs or entry-level occupations that lead to high demand jobs. Career pathways must be diverse with multiple entry and exit points allowing individuals of varying abilities, including low-skilled adults and youth with multiple barriers to employment, especially those with disabilities, to have realistic access to pathways. The State will support career pathways that help adults and youth enter the labor force and/or advance among multiple occupations, advance within an occupation or move to a new occupation that has similar skills to a previous occupation.

The West Virginia workforce development system will maintain partnerships with employers, community colleges, secondary and post-secondary certificate granting schools, and the LWDBs to continue assisting individuals to acquire micro-credentials that demonstrate skill development. This allows for the attainment of employability skills and measurable skill gains to align career pathways for individuals with barriers to employment, especially those with disabilities.

West Virginia also promotes access to Registered Apprenticeship programs focusing on non-traditional industries and occupations and will continue to refer individuals to training programs that lead to self-sufficiency.

More specifically, the Career Pathways System encompasses education and training strategies that go from the acquisition of skills and credentials to the advancement of higher levels of employment within high-demand industries. Career Pathways Services are linked to the State's Eligible Training Provider List (ETPL) through the Individualized Training Account (ITA) Program to help individuals understand that there are viable training options available to them. The Career Pathways System provides a road map for individuals that detail certificate or degree requirements and the employment outlook that will lead them to obtain desired education and employment goals. Individuals can also access work-based training options such as OJT, Customized Training and Incumbent Worker Training. Individuals who do not meet a training program's entrance requirements and/or eligibility requirements are offered alternate services.

West Virginia also works closely with Adult Education, the secondary and post-secondary schools, the community college system and with employers to promote micro-credentials that establish job readiness, the achievement of employability skills and measurable skills gains which align to career pathways for individuals with challenges to employment.

Goal 4: Promote Career Pathways.

West Virginia emphasizes career pathways to assist individuals entering and moving within the labor force and to educate employers on the advantages of career pathways.

Strategy 4.1: Adhere to WIOA career pathways development.

Career pathway programs being developed within Adult Education, Career and Technical Education (CTE), and the Community and Technical College System (CTCS) will be utilized to assist individuals in achieving their educational and employment goals. This integrated system will allow participants to enter their career pathway at any level in addition to entering at the postsecondary level.

The delivery of career pathways services is diverse depending on the individual's skill level and if they have barriers to employment. Career pathways services are based on high demand occupations that connect education, training, support services and credentials in a way that optimizes the progress and success for individuals with varying levels of abilities and needs. The Career Pathways System provides individuals most at risk of dropping out of school or failing to graduate college with the opportunities they need to obtain or build upon existing credentials.

Career pathways include, but are not limited to, intake, assessment, advising, instruction and individual learning plans. Partnerships are in place between the local workforce development system, DRS, post-secondary institutions and supportive services. DRS, for example, continues to inform its consumers about available career pathway programs available through Adult Education, CTE, the CTCS, and four-year colleges. In 2021, DRS assisted 924 consumers with four-year college training, 180 consumers with junior/community college training and 139 consumers with other types of occupational/vocational training.

Besides the delivery of career pathways services, other Adult Education and Literacy activities may be offered that include basic literacy instruction or instruction in English as a second language, Test of Adult Secondary Completion (TASC), Fast TRACK, contextualized career cluster Fast TRACK, College Transition Fast TRACK and integrated education. Career pathways services are linked to the State's Eligible Training Provider List (ETPL) via the regional ITA Program, in an effort to help job seekers understand the viable training options that are available to them and how training can be leveraged for success.

The Career Pathways system is diverse with multiple entry and exit points that allow individuals with varying degrees of ability to have realistic access to different pathways. Individuals can be assured that anytime they enter the local workforce development system, there will be a clear pathway that ensures referrals are made to appropriate programs and services, and ultimately, successful outcomes are achieved. Any point of entry will provide an individual access to the full continuum of programs and services.

Strategy 4.2: Enhance West Virginia's current Career Pathways system.

To enhance the Career Pathways system, West Virginia will maintain a comprehensive system that combines education, training, counseling, and support services from multiple programs,

including secondary and postsecondary CTE, Adult and Literacy Education (Adult Education), Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T), the CTCS of West Virginia and higher education.

Our workforce development system will ensure that career pathways are aligned to in-demand occupations likely to pay sustaining wages. The LWDBs will engage employers as well as local education providers, such as the Career and Technical schools and Community Colleges, to accomplish this goal.

West Virginia will also place individuals with barriers to employment, especially those with disabilities, into quality entry-level jobs that provide the work experience and non-technical skills necessary to lead to employment in high-demand jobs. OJT and incumbent worker training will continue to be tied to a career pathway.

Strategy 4.3: Educate individuals and employers to encourage career pathways in training and employment environments.

West Virginia's workforce development system (WDS) provides a wealth of information regarding career pathways to both individuals and employers primarily through websites maintained by WorkForce West Virginia, the seven regional Workforce Development Boards, and partner-agency websites such as DRS's PathwaysWV.org. These sites provide job seekers and employers information about the workforce services provided in West Virginia including, but not limited to, career counseling, how to gain access to education and training programs, labor market information, and job services. These websites also provide links to other sites maintained by all partners in West Virginia's workforce development system. Employers and individuals alike can access these websites or visit one of West Virginia's AJCs or a local One-Stop office to learn about and gain access to career pathways.

The West Virginia WDS will keep information on the workforce development website up to date regarding career pathways and information provided by the Department of Education and the Community and Technical College System around initiatives such as Classroom 2 Career.

The Classroom 2 Career Navigator is a collaboration between K-12, higher education and the West Virginia Department of Commerce that highlights college and career pathway options for West Virginia students. This website provides access to useful information about colleges, the military, entrepreneurship, work based learning and other resources to help guide post-secondary decisions and career pathway options beyond high school. Furthermore, the Classroom 2 Career initiative has developed a statewide system to track and manage a student's work-based learning activities, such as community service projects, clinicals, and internships/apprenticeships.

Goal 5: Identify and Maximize Postsecondary and Employment Opportunities for Youth.

West Virginia will continue to identify the employment challenges faced by youth and provide access to postsecondary training/education and employment opportunities to improve our state's Labor Force Participation Rate (LFPR).

Strategy 5.1: Execution of WIOA regulations regarding youth.

Recognizing the new priority on Out of School Youth (OSY), West Virginia will identify models and effective practices such as recruitment and flexible enrollment (e.g., self-attestation, co-

enrollment, career pathways and retention) to help local workforce development staff successfully meet the needs of those individuals.

West Virginia will also partner with the U.S. Departments of Labor and Education and with the LWDBs to ensure that statistical models and negotiated performance levels are established and calibrated to accurately reflect the profiles of youth being served within the State and in each local area.

To be eligible to participate in youth programs and services, youth must be between the ages of 14 and 24 and meet eligibility requirements. At least 20 percent of youth funds are spent on paid and unpaid work experiences.

WIOA funding enables delivery of a comprehensive array of youth services that prepare youth for post-secondary educational and employment opportunities, the attainment of educational and/or skills training credentials, and WIOA funding assists youth with gaining employment with career opportunities. This is accomplished by assessing the participant's skills, interests, needs and personal goals; creating customized service plans in collaboration with the participant; and expanding the participant's connection to and understanding of the local economy, educational opportunities, and available community services. This process is organized and coordinated around 14 WIOA Youth program elements, which must be made available to every participant: 1) Tutoring, Study Skills Training, Instruction and Drop-Out Prevention; 2) Alternative Secondary School Services/Dropout Recovery Services; 3) Paid and Unpaid Work Experiences; 4) Occupational Skill Training; 5) Educational Training Opportunities; 6) Leadership Development; 7) Supportive Services; 8) Adult Mentoring; 9) Follow-Up Services; 10) Comprehensive Guidance & Counseling; 11) Financial Literacy Education; 12) Entrepreneurial Skills Training; 13) Labor Market and Employment Information; and, 14) Access to Post-Secondary Education and Training.

Strategy 5.2: Coordination of youth services within the workforce development system.

The coordination of youth services across all WIOA partners is key to the successful delivery of services to the youth of our state. To that end, West Virginia's workforce development system co-enrolls high-risk individuals, ages 18 to 24, as both WIOA Adult and WIOA Youth participants to leverage funds and provide necessary services. Co-enrollment can occur in Title II adult basic education services, EARN, TANF, or other partner programs. West Virginia also uses Individual Training Accounts (ITA) for 18- to 24-year-olds in combination with work-based learning opportunities.

Empower WV is a program that will provide assistance for graduating high school seniors who do not have a plan after graduation. WorkForce West Virginia (WFWV) will work with local schools to identify those youth who will be served by Empower WV. Individuals participating in the program will be assessed for skills, interests, and work values. Using these assessments, WFWV staff will work with participants to determine their goals and provide a pathway to training or employment. Participants may be referred to partners to assist with overcoming barriers to education or employment. Empower WV will begin as a pilot program in Workforce Development Region 3, and then expand statewide.

West Virginia will continue to expand opportunities for youth to acquire post-secondary skills and credentials needed for high wage jobs through increased access to career and technical education programs and work-based learning experiences. The West Virginia Department of Education (WVDE) and the CTCS will work cooperatively to explore and develop appropriate

connections between WIOA youth activities and Strengthening Career and Technical Education Act for the 21st Century (Perkins V) postsecondary and state-funded programming.

The WVDE will support the transformation and modernization of Career and Technical Education (CTE) and align it with the career pathways recognized by the State.

The Local Workforce Development Boards (LWDB) will collaborate with YouthBuild, JobCorps, and AmeriCorps sites, identifying partnerships in local plans.

Additionally, the Division of Rehabilitation Services (DRS) hosts summer Career Exploration Opportunity (CEO) Summits for students entering their senior year of high school. The four-day summits provide tools and information to support students in obtaining long-term career success. The curriculum includes career planning and preparation, self-assessments, completing job applications, interviewing skills, how to dress for employment, work ethic, cell phone and internet safety, and self-advocacy. DRS also offers the Positive Outcomes within Education and Rehabilitation (POWER) job shadowing program that provides students who are interested in professional careers an opportunity to spend a few hours or a day with a skilled worker in the student's vocational field of interest, allowing the student to explore a specific career interest by observing an employee perform his or her work duties at his or her place of employment.

West Virginia's Local Workforce Development Boards (LWDBs) also offer a number of opportunities for youth to explore career interests, find educational or training programs, or to gain employment. One of the goals is to ensure youth participants graduate high school, or successfully pass its equivalent, and pursue some form of post-secondary training or education in a viable career pathway or successfully gain employment in a "high demand" occupation. Each LWDB also maintains strong partnerships with post-secondary institutions, the Community and Technical College System, and with institutions of higher education to serve local youth.

Strategy 5.3: Provide youth a clear pathway to success.

West Virginia's workforce development system will work to identify on-ramps, access points, and support services which enable youth participants to enter and successfully complete training and enter employment. Programs such as YouthReady and Youth Services Systems (YSS) provide individualized services to youth that will help them to explore their career interests, obtain needed education or training, and ultimately assist youth in entering the labor force with good-paying careers. Again, collaboration with all WIOA partners is essential to providing the youth of West Virginia with a clear pathway to success.

Goal 6: Closer Align West Virginia's Labor Force Participation Rate with the National Labor Force Participation Rate (LFPR).

West Virginia has the lowest LFPR in the United States. Increasing labor force participation rates and reducing unemployment rate disparities for people with disabilities, both younger and older workers, and people with lower educational attainment would lead to measurable increases in the size of the state's available labor force. Helping minorities and other groups with barriers to employment is critical to ensuring that West Virginia's employers are able to find workers and our economy is able to expand.

Strategy 6.1: Match individuals to basic education.

To increase the labor force participation rate, it is essential for West Virginia to provide individuals with access to basic education so they can acquire the skills necessary to enter the

workforce. To this end, West Virginia's workforce development system has a variety of programs available to provide basic education and skills to individuals seeking our services.

Individuals without a high school equivalency, or those who have a basic skills deficiency, will be referred through an existing referral system to Adult Education to provide options for high school equivalency and basic skills testing and training.

Coordinating services with Adult Education places more emphasis on serving low-skilled adults; those with low levels of literacy skills or those who are English language learners. Adult Education services enable individuals to acquire the basic skills and English language services that are necessary to complete a secondary school education. Adult Education services include work readiness, workplace preparation, career planning and case management services. Adult Education staff help individuals access employment and/or post-secondary education or training opportunities to prepare and plan for entry into a career pathway. Adult Education staff also help assist individuals in the preparation for the high school equivalency exam at various sites. Individuals are also connected to needed support services like childcare, transportation, housing, and health care.

Core WIOA partners also assist individuals by offering the Test of Adult Basic Education (TABE). This test identifies those areas where an individual may be skills-deficient, which allows West Virginia's workforce development system to help the individual obtain training to improve their basic skills.

Strategy 6.2: Match individuals to postsecondary training or education.

West Virginia's workforce development system continues to assist individuals to identify career pathways that provide skills needed for high demand occupations that lead to higher wages. We match individuals to postsecondary training or education via the intake process, determined by the individual's stated goals. If a referral is necessary to meet their employment goals, or if, in conversation, furthering education or training interest is expressed or implied, a career planner makes an appropriate referral to a partner for services, education, and/or training.

Moreover, West Virginia encourages, supports, and funds programs at post-secondary institutions that train individuals for high demand occupations. To prepare and inform individuals about post-secondary education opportunities, One-Stop Operator staff carefully review and interpret the most current labor market data for individuals, along with average earnings per occupation and the types and lengths of training or degrees required for high demand employment opportunities. Training programs must lead to a recognized post-secondary credential, secondary school diploma or its equivalent; employment; or measurable skill gains that can lead to a credential or to employment.

Training services are available for individuals who, after an interview, evaluation or assessment and case management, are determined to be unlikely or unable to obtain or retain employment that leads to self-sufficiency or higher wages from previous employment through career services alone. The participant must be determined to need training services and possess the skills and qualifications to successfully participate in the selected program.

The WIOA list of training services is not all-inclusive and additional training services may be provided. Training services may include, for example, occupational skills training, on-the-job training (OJT), or a registered apprenticeship that incorporates both OJT and classroom training,

Incumbent Worker Training, pre-apprenticeship training, workplace training with related instruction, training programs offered by the private sector, skill upgrading and retraining, entrepreneurial training, and Transitional Jobs.

Some participants may need additional services to assist their vocational training, such as job readiness training, literacy activities including English language training, and customized training. The WIOA training services must be provided when other sources of grant assistance are unavailable to the individual.

Strategy 6.3: Utilize career pathways when working with the population age 16-24.

Core WIOA partners will continue to collaborate to ensure that youth have clear career pathways and the partners will work together to eliminate barriers to employment for West Virginia's youth. Paid work experience will provide youth with relevant experience and training to help them achieve their employment goals.

Additionally, the local workforce development boards (LWDBs) will work with the WIOA partners to provide work experience, soft skills training, career counseling, and other related services to West Virginia's youth in order to enhance their ability to successfully enter the workforce.

West Virginia's workforce development system will help ensure that young individuals gain access to training that develops their basic skills, occupational skills, and work-readiness skills. The needs of each individual are determined during the intake process and each person is referred to partner-agency services as needed.

Strategy 6.4: Improve the job matching rate.

Making better job matches between individuals and employers reduces an individual's time between jobs and minimizes delays to entering the workforce.

Job orders from businesses describing open positions are entered into WorkForce's Mid-Atlantic Career Consortium (MACC) system. Partners in the workforce development system have access to the MACC, thus all job orders in the MACC database are visible to all partners.

The MACC is also used to help match available job seekers with open positions. Individuals seeking services from West Virginia's workforce development system have their employment and educational backgrounds entered into the MACC which allows WorkForce's Wagner-Peyser staff to match individuals to open employment opportunities.

In addition, partner agencies such as the Division of Rehabilitation Services (DRS) collect employment information from their business contacts. This information is then shared with the workforce development system through the MACC.

Finally, entities such as WorkForce West Virginia, DRS, Adult Education and the local workforce development boards participate in Business Service Teams that provide a full range of workforce development services to both individuals and employers that better facilitates job matching.

Strategy 6.5: The State will expand opportunities for youth to acquire post-secondary skills and credentials needed for high wage jobs through increased access to career and technical education programs and work-based learning experiences. The Department of Education and the Community Technical College System will work cooperatively to

explore and develop appropriate connections between WIOA youth activities and Perkins postsecondary and state-funded programming.

DRS will continue to provide Pre-Employment Transition Services (ETS) to students with disabilities (ages 14-21), including work-based learning experiences and counseling on post-secondary education/training opportunities, including career and technical education programs, to acquire additional skills and credentials.

In addition, DRS provides the following opportunities to students with disabilities:

- Postsecondary Education Opportunities (PSEOs) – Provides participants with counseling on post-secondary educational opportunities by coordinating structured day visits (up to 8 hours) to campuses of Colleges and Universities, Career and Technical Education, or other Vocational/Adult Educational Facilities.
- Work-Based Learning Experiences – Provided in conjunction with CRPs to pair students with disabilities with local employers willing to provide short-term work experiences to assist in developing an understanding of the demands of paid work, improvement of soft skills needed to be successful in any employment setting and assist in better understanding of career choices. Students complete the experience after a maximum of 40 work hours, over the course of 60 days, earning no less than minimum wage. The CRPs are paid to arrange and monitor the experience, as well as pay the students.
- Positive Outcomes Within Education and Rehabilitation (POWER) program – This is DRS' job shadowing program. POWER offers DRS transition students who are interested in professional careers an opportunity to spend a few hours or a day with a skilled worker in the student's vocational field of interest, allowing the student to explore a specific career of interest by observing an employee perform his or her work duties at his or her place of employment. The experience should provide realistic career information that will aid the student in making career choices.

Strategy 6.6: The Department of Education will explore the transformation and modernization of career and technical education (CTE) and evaluate the opportunity to align CTE with the career pathways recognized by the State.

Strategy 6.7: Explore opportunities to establish Career Development in K-12 education curriculum starting with eight (8th) grade to include career orientation, workforce development information and promote career pathways for youth.

DRS will continue to partner with the West Virginia Department of Education (WVDE) and county boards of education to provide outreach, information, and services to students with disabilities (ages 14-21). DRS and the WVDE have jointly developed Pre-ETS materials for use by students with disabilities, parents, and teachers to explore potential careers and post-secondary opportunities.

- To complement the Pathways to the Future Pre-ETS website (www.PathwaysWV.org), DRS and the WVDE developed Sample Lessons for Life After High School. Special Education teachers across the state have been trained on the use of the 244-page manual to provide students with multiple, detailed lessons on job exploration/career counseling, work-based learning experiences, counseling on post-secondary education/training opportunities, workplace readiness training, and instruction in self-advocacy.

- This manual demonstrates the “how to” for shared services, particularly for students in grades 9 and 10, through lessons designed for groups or individuals that are co-taught by Rehabilitation and Education staff or independently. They have been matched to WVDE College and Career Readiness Standards for English Language Arts and Health Education. The initial unit format utilizes the backward design process formalized by Wiggins and McTighe. The Understanding by Design Planning Template was utilized to develop a plan for each of the five Pre-ETS goal areas: Job Exploration/Career Counseling, Work-Based Learning, Counseling on Post-Secondary Education, Workplace Readiness Training, and Self-Advocacy. Beginning with the “end in mind” guides attention on goal and assessment outcomes which leads to the development of individual lessons to achieve them. Sample lesson topics were selected from a comprehensive ideas list for each goal area that was generated from direct providers. The sample lesson plans are developed within a template familiar to classroom instructors. The intent of this manual is to bring professionals together to share expertise that improves outcomes for youth with challenges.
- In FY 2019, DRS and the WVDE updated this manual, as well as additional Pathways to the Future materials, and distributed them to students with disabilities across the state during the 2019-2020 school year. The additional materials include:
 - Pre-ETS transition slide guide
 - Parent/student guide
 - Transition Services Planner
 - Special Education teachers across the state continue to receive training on the use of these materials and use of the Pathways to the Future website. The materials and website provide students, parents, and teachers information about career development, labor market information, career pathways, workforce development system resources, and post-secondary training opportunities.
- In an effort to promote STEM fields, DRS sponsored a Build It, Keep It, Share It (BIKISI) program in the summer of 2019. In a one-week training program, students receive the knowledge, tools, and components they need to build a computer. At the end of the training, they take the knowledge—and the computer—home with them. The program is designed to develop student interest in the sciences through computers to promote interest in high-paying jobs in high-demand job sectors. In 2019, the program was held in 12 locations and served 363 students with disabilities.

Strategy 6.8: Local WorkForce Development Boards will explore opportunities to increase their focus on developing and establishing summer youth programs providing work experience and soft skills to youth.

All core partners are represented on the State’s Inter-agency Collaborative Team (ICT), a group centered around WorkForce West Virginia (WFWV) to provide ongoing attention to addressing issues that will build and continually improve the overall workforce development system (WDS). The team is the sole State-level interagency group for addressing issues or concerns regarding building and maintaining the most effective and efficient implementation of the overall WDS in West Virginia. All partner agencies participate in regular, monthly meetings of the ICT, and are signatories of the ICT Memorandum of Understanding (MOU), which is drafted annually. The ICT membership includes:

- WorkForce West Virginia (WFWV)
- West Virginia Employment Service–Chapter 41 of Title 38 - Local Veterans employment representatives & Disabled Veteran outreach program
- Employment Service–Wagner-Peyser, Unemployment Compensation and WIOA
- Bureau of Senior Services
- Council for Community and Technical College Education
- West Virginia Department of Education (WVDE)
- Office of Diversion and Transition Programs (ODTP)
- Office of Adult Education and Workforce Development
- Department of Commerce–West Virginia Division of Rehabilitation Services (DRS)
- Department of Health and Human Resources (DHHR)
 - Bureau of Children & Families
 - Temporary Assistance for Needy Families (TANF)
 - Food Stamp Employment & Training, US Dept of Agriculture
- West Virginia Development Office
 - Business and Industrial Development
 - Community Development Division (Community Services Block Grant Act)

In addition, DRS will work to partner with LWDBs to provide and expand opportunities for work-based learning experiences and workplace readiness training (including soft skills) for students with disabilities (ages 14-21).

Alignment of Core Program Activities to Implement State Strategy

Each WIOA core agency has roles and responsibilities in serving consumers and employers through the American Job Centers (AJC). These partners collaborate to better serve consumers utilizing these one-stop employment centers by sharing resources, reducing redundancies, and optimizing service delivery. Depending on the needs of individuals and the available services and resources from the programs (depending on eligibility), one or more agencies may provide services to a consumer. All three partners work with other agencies in various capacities to ensure its alignment with other WIOA programs.

To ensure the alignment of activities across programs, partners maintain ongoing communication to maintain awareness of the activities of other programs. In order to best serve consumers, state and local level staff are kept well-informed of the services and other resources available from partner agencies. This communication occurs in several ways. At the state level, the AJCs, where daily interaction with partner agency staff occurs. Cross-training is also available, if needed. These activities result in better services to AJC consumers because they are provided the most appropriate services while preserving resources for future consumers.

Further alignment of services will be conducted at the individual consumer level. As appropriate, consumers may be referred to any of the core partners. When this occurs and a consumer is

served by more than one WIOA agency (co-enrolled), the benefits of West Virginia's integrated Information Technology (IT) system become available to the consumer and to service providers.

The integrated system updates daily to inform service providers of the services that other agencies are providing to a co-enrolled consumer. This knowledge will allow each agency to coordinate services while also avoiding the duplication of services. In addition, core partners will host and participate in community forums targeting special populations and provide public service announcements about services available. This system is in the process of being developed and in the initial stage of implementation core and partner programs will collaborate to ensure that resources are leveraged, and services are not duplicated. Integration among core partners enables the WDS to remain flexible and adaptable while operating in an efficient and cost-effective manner.

AJC services will provide improved access and efficiency, along with value-added services to customers of the WDS. Partners are responsible for the delivery of workforce education and training programs and related services, as well as education programs that support career preparation and advancement. Strategically, the programs and agencies serve either a common customer or are charged with achieving similar employment and education outcomes for their targeted customer groups, including those most in need and those with disabilities. These services will include:

- Providing services that facilitate the match between high-demand jobs, employers and job seekers;
- Providing employment, training, and retention services for eligible WIOA participants and prioritizing services to recipients of public assistance and other low-income individuals and individuals who are disabled and/or basic skills deficient, to spur financial self-sufficiency;
- Developing adult education and family literacy programs that ensure all adults have the basic education skills they need to contribute to their families and communities;
- Providing employment, training, and retention services to individuals with barriers to employment, including veterans, individuals with disabilities, trade-affected individuals, older individuals, ex-offenders, homeless individuals, long-term unemployed individuals, and youth;
- Encouraging the use of training services that provide portable, stackable and transferable credit and credentials;
- Providing "wrap around" support services, such as childcare, unemployment insurance, and transportation to enable eligible individuals to work or participate in employment and training activities;
- Monitoring and evaluating compliance of local area service delivery for fiscal accountability and program effectiveness; and
- Providing technical assistance to LWDBs and training providers to ensure the most effective delivery of workforce services.

The state will take further actions to coordinate services between WIOA core programs and non-core programs and services to create an effective career pathway system. These actions will include the following:

- The education agencies and educational institutions will work with the WVWFDB and LWDBs to build career pathways that include secondary and postsecondary career and technical education programs of study.
- The state will expand skill-building services funded through SNAP E&T, including leveraging federal funding available through SNAP E&T 50/50 funds for employment, training, and related support services, and coordinate those services with WIOA core programs.
- The state will increase the integration of TANF employment and training services with WIOA core programs.
- The state will design career pathways to have an entry point along the pathway that meets the adult education and workforce program alignment requirements in the “ability to benefit” provision of Title IV of the federal Higher Education Act, to enable eligible participants without a high school diploma to qualify for Pell Grants and other federal student financial assistance.

III. OPERATIONAL PLANNING ELEMENTS

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

A. STATE STRATEGY IMPLEMENTATION

Training of the State Board Members

Training will be continual and will be in-person and electronically delivered. Orientation will be provided to all new members. Staff resources will be provided by WorkForce West Virginia (WFWV) to enable the board to carry out functions.

The Board shall assist in implementing and overseeing a comprehensive state workforce development system that prepares West Virginia citizens for employment opportunities offered by West Virginia businesses. The Board shall make recommendations regarding program implementation, operation, and modifications to all state agencies administering workforce investment programs. The Board shall also assist and encourage West Virginia’s educational institutions and public assistance systems to improve their ability to prepare people for gainful employment.

The Governor appoints the members of the State Workforce Development Board (SWDB) and designates one of the business representatives to serve as the Chairperson. The SWDB gives the Chairperson authority through the bylaws to create or dissolve committees and the task forces to accomplish the state board functions of the Board as required under section 101 (d) of WIOA. The general Board meetings are scheduled to occur every quarter. Significant decisions are made with the approval of a simple majority of a Board quorum. Status updates on any current initiatives are given, as appropriate, to the full Board during regular meetings and if action is required, the Board is able to act accordingly. Public notice of regular Board meetings will be provided to all members no less than seven days before the day of the meeting. All meetings of the Board will be publicly announced in advance and open and accessible to the public.

Goal 1: Maximize Efficiency of the Workforce Development System (WDS).

For WIOA to continue to be successful, the WDS must be seamless, comprehensive, and accessible. Partners in the workforce development system will work together in order to maximize benefits to our customers and improve West Virginia's Labor Force Participation Rate (LFPR).

Strategy 1.1: Core partners will collaborate to align program initiatives and processes.

- Annually update Memoranda of Understanding (MOU) with all partners.
- Conduct regularly scheduled meetings to discuss workforce development. The meetings consist of members from each agency subject to the reporting provisions of WIOA. Meetings with partners will promote program integration to eliminate duplication of efforts.
- Interagency Collaborative Team (ICT) meetings (monthly)
- WVWFDB (quarterly)

Strategy 1.2: Ensure cross-training of all workforce development system partners.

- Deploy a comprehensive online training program to provide exposure to workforce development system (WDS) services.
- Engage in team-based system management for the customers at our American Job Centers of West Virginia (AJCWV).
- Train staff to serve individuals with barriers to employment, including individuals with disabilities and lacking adult basic education.
 - DRS will train partner staff regarding service to individuals with disabilities, including etiquette, accessibility, accommodations, resources, and other relevant topics, as appropriate.
- Technical assistance and training will be provided on the state management information system to all workforce development staff, both regionally and locally.

Strategy 1.3: Communicate with all partners within the workforce development system.

- Workforce development news and notices are updated on the WorkForce West Virginia (WFWV) website www.workforcewv.org.
- The state convenes monthly meetings with local workforce development board directors.

Strategy 1.4: Maintain an integrated state management information system utilized by core partners.

- Provide user training on the integrated state management information system to workforce development staff, both regionally and locally.
- Maintain the integrated state management information system for co-enrollment of individuals receiving services from the core partners.
- Utilize the integrated state management information system to monitor and evaluate performance of core partner programs in relation to the six state goals.

Goal 2: Strengthen Relationships with Employers.

Collaborate with employers utilizing a variety of methods to develop solutions to their workforce needs.

Strategy 2.1: Partner with employers to identify workforce needs.

- Solicit employer feedback to identify the skills and competencies necessary for employment.
- Promote and develop sector strategies based on labor market information and employer needs.
- The WVWFDB will set policies for providing services to employers through enhanced agency coordination. State agencies will act as intermediaries for organizing outreach to employers on a wider geographical basis than local regions.
- Connect employers to participate in business-education partnerships. These partnerships connect schools, employers, and community organizations with individuals to provide career-related experiences and employment opportunities such as soft skills development, internships, on-the-job training (OJT), workplace shadowing, and career mentoring.

Strategy 2.2: Provide access to training programs that meet the needs of employers.

- Maintain partnerships with employers, community colleges, secondary and post-secondary certificate granting schools, and LWDBs to continue micro-credentials that demonstrate skill development. This allows for the attainment of employability skills and measurable skill gains to align career pathways for individuals with barriers to employment, especially those with disabilities.
- Promote the development of Registered Apprenticeship programs focusing on non-traditional industries and occupations.
- Maintain relationships with the secondary, postsecondary, and adult education systems to ensure that programs of study reflect employer needs.
- Encourage employers that receive state funds from economic development and similar programs to utilize the public workforce development system.

To demonstrate WFVW's encouragement of co-enrollment, the following numbers were queried from the MACC from July 1, 2016 through June 30, 2019:

- WP and WIOA Adult-1,590
- WP and WIOA DW-3,030
- WIOA DW and TAA-398
- WIOA DW and NDWG-1,569
- WIOA Adult and NDWG-438

Goal 3: Overcome Employment Barriers of Individuals.

Strategy 3.1: Assess needs of individuals seeking employment and/or training.

- Provide counseling to ascertain service needs of individuals to determine skills necessary for desired employment.

- Coordinate cross-program services for job preparation activities to develop employability skills, adult basic education, and occupational training. When appropriate, individuals will be co-enrolled between two or more core programs to accomplish this goal.

Strategy 3.2: Use the Employment First framework to ensure competitive, integrated employment as the priority option for individuals with significant disabilities.

- Engage individuals with disabilities by offering realistic entry points into career pathways.
- Through integrated efforts, the core partners will increase awareness and access to services to individuals with disabilities. These efforts include maximizing resources, co-enrollment, cross referrals, outreach, and service delivery which will allow for successful employment outcomes.

Strategy 3.3: Provide access to training programs that meet the needs of individuals.

- Maintain partnerships with employers, community colleges, secondary and post-secondary certificate granting schools, and LWDBs to continue micro-credentials that demonstrate skill development. This allows for the attainment of employability skills and measurable skill gains to align career pathways for individuals with barriers to employment, especially those with disabilities.
- Promote access to Registered Apprenticeship programs focusing on non-traditional industries and occupations.
- Refer individuals to training programs that lead to self-sufficiency.

Goal 4: Promote Career Pathways.

Emphasize career pathways to assist individuals entering and moving within the labor force and to educate employers on the advantages of career pathways.

Strategy 4.1: Adhere to WIOA career pathways development.

- West Virginia Adult Education, Career and Technical Education (CTE), and the Community and Technical College System (CTCS) of West Virginia will continue strategies to integrate career pathway programs. This integrated system will permit individuals to enter the pathway at any level.

Strategy 4.2: Enhance current career pathways system.

- Maintain a comprehensive career pathway system that combines education, training, counseling, and support services from multiple programs, including secondary and postsecondary CTE, Adult and Literacy Education (Adult Education), Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP) Employment and Training, the CTCS of West Virginia and higher education.
- Ensure career pathways are aligned to in-demand occupations likely to pay sustaining wages. The LWDBs will engage employers to accomplish this goal.
- Place individuals with barriers to employment, especially those with disabilities, into quality entry-level jobs that provide the work experience and non-technical skills necessary to lead to employment in high-demand jobs.

- Require OJT and incumbent worker training be tied to a career pathway.

Strategy 4.3: Educate individuals and employers to encourage career pathways in training and employment environments.

- Promote and support the creation of pre-apprenticeship and Registered Apprenticeship programs in non-traditional occupations as part of a relevant career pathway model. Apprenticeship opportunities within the workforce development system will be promoted as job training options to individuals.
- Provide career guidance to individuals with barriers, especially those with disabilities, about programs and services that provide an effective pathway to their career goals.
- The West Virginia WDS will keep information on the workforce development website up to date regarding career pathways and information provided by the Department of Education around initiatives such as Simulated Workplace.
 - WVDE staff worked with numerous businesses and industries throughout the state to design the Simulated Workplace. This educational initiative was created to assist schools in integrating workplace environment protocols into the CTE programs that align with West Virginia workforce requirements. These protocols focus on transitioning the classroom to a student-driven “company” environment, random drug testing, professionalism, attendance, 5-S quality and safety. Simulated Workplace has enhanced instructional delivery of CTE and created a more engaged student. The Simulated Workplace environment provides students with the opportunity to take ownership of their individual performance as it impacts the overall success of their education while thriving in an authentic workplace culture. Simulated Workplace also encourages local business and industry experts to join onsite review teams to assist schools in meeting their workforce needs and expectations.

Goal 5: Identify and Maximize Postsecondary and Employment Opportunities for Youth.

Identify employment challenges faced by youth and provide access to postsecondary training/education and employment opportunities to improve West Virginia’s labor force participation rate.

Strategy 5.1: Execution of WIOA regulations regarding youth.

- Recognizing the new priority on out-of-school youth (OSY), the State will identify models and effective practices, including for recruitment, flexible enrollment (e.g. self-attestation, co-enrollment, career pathways and retention) to help local area staff successfully meet the needs of those individuals.
- Identify models and effective practices for youth, including recruitment and flexible enrollment, to help local area staff successfully meet the needs of those individuals.
- Partner with the U.S. Departments of Labor and Education and LWDBs ensuring statistical models and negotiated performance levels are established and calibrated to accurately reflect the profiles of youth being served within the State and in each local area.

Strategy 5.2: Coordination of youth services within the workforce development system.

- Develop transitional jobs, social enterprises, and other work experience strategies to help OSY with limited work histories develop the skills needed for workplace success.
- Co-enroll high-risk individuals, ages 18 to 24, as both WIOA Adult and WIOA Youth participants to leverage funds and provide necessary services. Co-enrollment can occur in Title II adult basic education services, EARN, TANF, or other partner programs. Continue the use of Individual Training Accounts (ITAs) for 18 to 24-year olds in combination with work-based learning opportunities.
- The State will expand opportunities for youth to acquire post-secondary skills and credentials needed for high wage jobs through increased access to career and technical education programs and work-based learning experiences. The WVDE and the CTCS will work cooperatively to explore and develop appropriate connections between WIOA youth activities and Perkins postsecondary and state-funded programming.
- The WVDE will support the transformation and modernization of CTE and align CTE with the career pathways recognized by the State.
- LWDB will collaborate with YouthBuild, JobCorps, and AmeriCorps sites, identifying partnerships in local plans.

Strategy 5.3: Provide youth a clear pathway to success.

- Collaborate with LWDBs to identify access points which enable individuals to complete training and enter a successful career pathway.
- The Division of Rehabilitation Services (DRS) has re-aligned its resources to increase and improve services to youth with disabilities, especially high school students with disabilities. DRS has MOUs with all 55 county boards of education and has a vocational rehabilitation counselor assigned to each high school in the state. These counselors provide pre-employment transition services to students with disabilities to ensure students, and their parents, and school personnel are aware of available services, training, education, and employment options. Through the POWER program, students with disabilities have opportunities for job shadowing experiences. Through STEP, students may receive services from teachers outside of the classroom, including job coaching and job placement. Youth may also continue to receive services from DRS after exiting high school. This often includes additional training and education required to achieve their chosen employment goal.
- Leverage resources providing effective and efficient services to youth. This includes cross referrals and co-enrollment of individuals in addition to joint projects and activities at the state and regional level.
- Utilize the Office of Apprenticeship to promote apprenticeship and pre-apprenticeship opportunities for youth.
- Transcribed EDGE credit can be earned by students to matriculate from secondary career technical education to CTCS. The West Virginia EDGE was established in 2001 in Senate Bill 436. EDGE is an acronym for Earn a Degree-Graduate Early and is a result of the seamless curriculum initiative that focuses on curriculum alignment between

educational levels. The alignment process identifies curriculum gaps, eliminates curriculum duplication and sets curriculum mastery levels to predetermined standards while saving tuition money for students.

Goal 6: Align West Virginia's Labor Force Participation Rate with the National Labor Force Participation Rate (LFPR).

West Virginia has the lowest LFPR in the United States. Increasing labor force participation rates and reducing unemployment rate disparities for people with disabilities, both younger and older workers, and people with lower educational attainment would lead to measurable increases in the size of the state's available labor force. Helping minorities and other groups with barriers to employment is critical to ensuring that West Virginia's employers are able to find workers and our economy is able to expand.

Strategy 6.1: Match individuals to adult basic education.

- Individuals will be assessed and referred to adult basic education to obtain skills needed for their career pathway.
- Adult Education will track referral source and Education and Career Plan (ECP) utilization in its Management Information System (MIS).

Strategy 6.2: Match individuals to postsecondary training or education.

- Core partners will increase referrals to postsecondary training or education leading to employment.
- Capture data match with WFWV and Higher Education Policy Commission on individuals who enter postsecondary education or employment.

Strategy 6.3: Utilize career pathways when working with youth.

- Core partners will provide youth opportunities for academic enrichment and employment.

Strategy 6.4: Improve the ability of core partners to match individuals with employers.

- Making better job matches between individuals and employers reduces an individual's time between jobs and minimizes delays to entering the workforce.
- DRS employment specialists continuously collect employment information from their business contacts. This information, including job orders for open positions, is immediately input into WFWV's online MACC system and shared within the WDS.
- DRS will continue to serve on Business Service Teams (BSTs) with WFWV, Adult Education, LWDBs, and other related entities. Through training and standardizing informational materials, when possible, these teams provide a full range of WDS information when making visits to employers. This will allow the WDS to maximize the impact of employer visits and ensure that businesses are aware of all resources available through the WDS.
- Enhance State MIS to ensure information gathered is complete and accurate.
- Improve accuracy of occupational classification among employer postings, training program, and participant work histories.

Strategy 6.5: The State will expand opportunities for youth to acquire post-secondary skills and credentials needed for high wage jobs through increased access to career and technical education programs and work-based learning experiences. The WVDE and CTCS will work cooperatively to explore and develop appropriate connections between WIOA youth activities and Strengthening Career and Technical Education Act for the 21st Century (Perkins V) postsecondary and state-funded programming.

Strategy 6.6: The Department of Education will explore the transformation and modernization of CTE and evaluate the opportunity to align CTE with the career pathways recognized by the State.

Strategy 6.7: Explore opportunities to establish Career Development in K-12 education curriculum starting with eight (8th) grade to include career orientation, workforce development information and promote career pathways for youth.

Strategy 6.8: LWDBs will explore opportunities to increase their focus on developing and establishing summer youth programs providing work experience and soft skills to youth.

Core Program Activities to Implement State Strategy

Each WIOA core agency has roles and responsibilities in serving consumers and employers through the AJCWV. These partners collaborate to better serve consumers utilizing these one-stop employment centers by sharing resources, reducing redundancies, and optimizing service delivery. Depending on the needs of individuals and the available services and resources from the programs (depending on eligibility), one or more agencies may provide services to a consumer. All three partners work with other agencies in various capacities to ensure its alignment with other WIOA programs.

To ensure the alignment of activities across programs, partners maintain ongoing communication to maintain awareness of the activities of other programs. In order to best serve consumers, state and local level staff are kept well-informed of the services and other resources available from partner agencies. This communication occurs in several ways. At the state level, the AJCs, where daily interaction with partner agency staff occurs. Cross-training is also available, if needed. These activities result in better services to AJC consumers because they are provided the most appropriate services while preserving resources for future consumers.

Further alignment of services will be conducted at the individual consumer level. As appropriate, consumers may be referred to any of the core partners. When this occurs and a consumer is served by more than one WIOA agency (co-enrolled), the benefits of West Virginia's integrated IT system become available to the consumer and service providers.

The integrated system will update daily to inform service providers of the services that other agencies are providing to a co-enrolled consumer. This knowledge will allow each agency to coordinate services while also avoiding the duplication of services. In addition, core partners will host and participate in community forums targeting special populations and provide public service announcements about services available. This system is in the process of being developed and in the initial stage of implementation core and partner programs will collaborate to ensure that resources are leveraged and services are not duplicated. Integration among core partners enables the WDS to remain flexible and adaptable while operating in an efficient and cost-effective manner.

AJC services will provide improved access and efficiency, along with value-added services to customers of the WDS. Partners are responsible for the delivery of workforce education and training programs and related services, as well as education programs that support career

preparation and advancement. Strategically, the programs and agencies serve either a common customer or are charged with achieving similar employment and education outcomes for their targeted customer groups, including those most in need and those with disabilities. These services will include:

- Providing services that facilitate the match between high-demand jobs, employers and job seekers;
- Providing job search, employment, training, and career and job retention services for eligible WIOA and TAA participants and prioritizing services to recipients of public assistance and other low-income individuals and individuals who are disabled and/or basic skills deficient, to spur financial self-sufficiency;
- Developing adult education and family literacy programs that ensure all adults have the basic education skills they need to contribute to their families and communities;
- Providing employment, training, and retention services to individuals with barriers to employment, including veterans, individuals with disabilities, trade-affected individuals, older individuals, ex-offenders, homeless individuals, long-term unemployed individuals, and youth;
- Encouraging the use of training services that provide portable, stackable and transferable credit and credentials;
- Providing wrap-around support services, such as childcare, unemployment insurance, and transportation to enable eligible individuals to work or participate in employment and training activities;
- Monitoring and evaluating compliance of local area service delivery for fiscal accountability and program effectiveness; and
- Providing technical assistance to LWDBs and training providers to ensure the most effective delivery of workforce services.

The state will take further actions to coordinate services between WIOA core programs and non-core programs and services to create an effective career pathway system. These actions will include the following:

- The education agencies and educational institutions will work with the WVWFDB and LWDBs to build career pathways that include secondary and postsecondary career and technical education programs of study.
- The state will expand skill-building services funded through SNAP E&T, including leveraging federal funding available through SNAP E&T 50/50 funds for employment, training, and related support services, and coordinate those services with WIOA core programs.
- The state will increase the integration of TANF employment and training services with WIOA core programs.
- The state will design career pathways to have an entry point along the pathway that meets the adult education and workforce program alignment requirements in the “ability to benefit” provision of Title IV of the federal Higher Education Act, to enable eligible participants without a high school diploma to qualify for Pell Grants and other federal student financial assistance.

The West Virginia workforce development system (WDS) extends beyond the core programs to include programs administered by numerous state agencies and quasi-governmental entities.

With a market-based and customer-focused plan, the Local Workforce Development Boards (LWDBs) continue to refine and improve West Virginia's structure for aligning core and optional programs under WIOA and other available resources to realize the state's vision and achieve its goals.

The West Virginia Workforce Development Board (WVWFDB) works diligently to promote alignment and collaboration across core programs. The core partners and all required partners are represented on the Board and attend meetings. The WVWFDB is focused on promoting greater connections between LWDBs and community organizations.

There are numerous examples of specific collaborations among partner programs beyond the high level strategic and planning efforts taking place through the interagency work group and WVWFDB including:

- The Division of Rehabilitation Services (DRS) works extensively with education partners including Local Education Agencies (LEAs) to coordinate the provision of pre-employment and other transition services for students with disabilities.
- WIOA Youth service providers coordinate with LEAs, adult education agencies, county human service offices, county assistance office income maintenance caseworkers, EARN contractors, juvenile justice and local law enforcement agencies, local housing authorities, DRS, economic development entities and other community and faith-based organizations to ensure participants have access to all the services they need to be successful in training activities and find employment.
- WIOA Youth will be notified of opportunities to co-enroll in the Temporary Assistance to Needy Families (TANF) program and will also be referred to the Adult Education program as appropriate.
- The braiding of WIOA Title I-B funded programs with other youth-directed state and local entities allows comprehensive services to be offered to all eligible low-income populations under WIOA. Available TANF funding will continue to support WIOA year-round services and summer employment activities.
- Applicants for Title II funds are required to describe how they will align services with local workforce development plans and how they will coordinate with other available education, training, and social services in the community. Alignment with LWDB's goals is required for funding.
- Strengthening Career and Technical Education Act for the 21st Century (Perkins V) providers assist job seekers in identifying their interests and abilities and aligning these skills needs with training and financial resources to assist with training. Training is linked to the state's high-demand jobs and is designed to lead to credential attainment. Both credential attainment and high-demand jobs alignment assist job seekers in securing employment with family-sustaining wages.
- The state co-enrolls all trade-impacted workers in the WIOA Dislocated Worker program to ensure all individuals receive the full range of available services and benefits to dislocated workers. Co-enrollment of WIOA/DW and TAA individuals maximizes the use

of partner resources, improves the availability and consistency of services, and increases the opportunity for positive outcomes.

- Adult Education will work with representatives from the Office of Diversion & Transition Programs (ODTP), the West Virginia Department of Corrections (DOC) and other education stakeholders to identify best practices to support the requirements of Section 225 of Title II.
- ODTP is working closely with CTE, CTCS, DHHR and WVDE and other partners to align its career pathways and reentry initiatives with on-going efforts in the workforce and education systems. These partnerships can provide opportunities for offenders to enhance skills and earn post-secondary credentials.
- The MACC is an integrated data platform that links human service, workforce, and wage record data to measure the outcomes of workforce development programs and identifies the supply of skilled workers in relation to employer demand.
- DRS continues to build new and strengthen existing partnerships with the DOC, regarding increasing and improving the agency's involvement in re-entry employment training to assist individuals with disabilities in the correctional system.
- WorkForce West Virginia (WFWV) will establish and participate in partnerships with other agencies and programs that are focused on combating veteran unemployment. WFWV recognizes that the emerging needs of veterans and their families are unique. Eligible veterans are entitled to priority services. Public Law 107-288, Title 38, U.S. Code and State Legislation mandates that qualified veterans receive priority in all employment and training programs including: referral to jobs and job training programs; counseling, testing and job development assistance; eligibility determination for tax credit programs. Co-enrollment of veterans in core partner services will be a priority.
- DRS strives to align its activities and services with other agencies, including WIOA partners. Because DRS provides services under an IPE, many alignment activities occur on the individual consumer level. DRS' Client Services Manual Section 2501.3 requires VR counselors to assess and utilize, if appropriate, any third-party comparable benefits and services. One example of this alignment occurs with DRS consumers that choose to receive four-year and/or community college training; consumers must utilize grants and other non-loan resources prior to DRS providing financial support.
- DRS is mandated not only to coordinate services and resources with comparable services and benefits providers, but also to collect and report these data (any involvement with a comparable services benefits provider in approximately 30 service categories) to the federal Rehabilitation Services Administration at the individual consumer level. The collection, monitoring, and evaluation of these data allow DRS to ensure coordination and alignment is taking place across the state.

Also, to ensure mandatory partners remain aligned and are actively involved in the progress of this plan, West Virginia has included the following statute in state code.

WV State Code: §5B-2B-9. Coordination between agencies providing workforce investment programs, local workforce development boards and the Executive Director of WorkForce West Virginia

1. To provide ongoing attention to addressing issues that will build and continually improve the overall workforce investment system, the Workforce Investment Interagency Collaborative Team is hereby created. The team shall be the single state interagency source for addressing issues or concerns related to building and maintaining the most effective and efficient implementation of the federal Workforce Investment Act and the overall workforce development system in West Virginia. The team shall focus on how best to collaborate between and among the state agencies directly involved in workforce investment activities and shall develop a strategic plan to that end. The team shall serve as a forum for the board to seek information or recommendations in furtherance of its responsibilities under this article. WorkForce West Virginia is the entity which shall convene the team at least monthly and shall provide administrative and other services to the team as the team requires.
2. The team shall consist of members from each agency subject to the reporting provisions of section five of this article. Each agency shall appoint two representatives to the team consisting of the chief official of the department or division and the official within that department or division who is directly responsible for overseeing the workforce investment program or activities at the state level. A designee may be selected to represent a member appointed to the team: Provided, that the designee has policy-making decision authority regarding workforce investment activities including program and fiscal issues. The team members have authority to make decisions on behalf of the agency at the level required for the team to address issues and advance system improvements.
3. The team shall coordinate the development of a self-sufficiency standard study for the State of West Virginia. The self-sufficiency standard is to measure how much income is needed for a household of a given composition in each place to adequately meet its basic needs without public or private assistance. Beginning on the first day of November, two thousand four, and every year thereafter, this study is to be reported to the Speaker of the House of Delegates, the President of the Senate, the Workforce Development Board and the Legislative Oversight Commission on Workforce Investment for Economic Development.
4. Beginning the first day of January, two thousand three, in order to lawfully continue any workforce investment activities, any agency subject to the reporting provisions of section five of this article shall enter into a memorandum of understanding with the Executive Director of WorkForce West Virginia and any local workforce Development Board representing an area of this state in which the agency is engaged in workforce investment activities. To the extent permitted by federal law, the agreements are to maximize coordination of workforce investment activities and eliminate duplication of services on both state and local levels.
5. No memorandum of understanding may be effective for more than one year without annual reaffirmation by the parties.
6. Any state agency entering a memorandum of understanding shall deliver a copy thereof to both the West Virginia Workforce Development Board (WVWVDB) and the legislative oversight commission.

Coordination of activities occurs at the state, regional, and local levels. The state-level Interagency Collaborative Team (ICT) meets monthly to share information and discuss past, present, and future activities among the partner agencies. At the regional level, West Virginia

Workforce Development Board (WVWFDB) meetings are attended by core partner staff; these meetings are particularly beneficial to “front line” staff members. Staff receive cross-training to learn about other core programs and share examples of integrated service provision for consumers co-enrolled in more than one core WIOA program.

The core partners have developed an interface that allows the sharing of common data elements for the enrollment of individuals. This allows case management services throughout the entire process and will also allow for follow up, performance and additional needs. The core partners will share common data elements through the interface. All partners will have one goal and that is to ensure individuals have received needed training and obtain employment.

As previously described, the WIOA core partner programs collaborate in numerous ways to coordinate activities and provide comprehensive, high-quality services, including supportive services to ACJWV consumers. The WIOA partner agencies meet at the state, regional, and local level to share activities, concerns, and solutions related to the West Virginia Workforce Development System (WDS). These meetings and cross trainings result in coordinated service delivery. Service delivery is further enhanced at the consumer level using the integrated IT system for co-enrolled individuals. The services that a consumer receives are based on consumer need and program eligibility requirements and resources. Though each agency may specialize in a specific area or serve a specific population (e.g., individuals with disabilities for Vocational Rehabilitation or individuals not in high school for Adult Education), the combined efforts and shared human and fiscal resources greatly benefit consumers, including employers, of the West Virginia WDS.

While some services and consumers may overlap, each WIOA program has specific roles, target populations, responsibilities, and areas of expertise within the WDS. For example, WorkForce West Virginia (WFWV) maintains the largest collection of job listings in the state; the Division of Rehabilitation Services (DRS) specializes in serving individuals, including high school students, with the most significant disabilities; and Adult Education provides educational programs to individuals aged 16 years or older who are not required to be enrolled in the public school system. By coordinating activities at the state and local levels, a comprehensive service delivery system can be developed and strengthened to provide consumers with the highest quality services.

All partners attend mandatory monthly meetings established by state statute where the discussion and collaboration of efforts will transpire. Reports will be provided, and successes will be shared.

While WFWV has always offered and continues to offer many and varied services to employers, 2019 has seen the implementation of a new approach to offering these services by establishing a Business Service Unit. The Unit consists of representatives from WFWV, Business Services Unit, the LWDBs, DRS, Adult Education, and Senior Services.

The WVWFDB is business-driven and provides much needed input into the direction of workforce programs. Falling directly in line are the local workforce development boards which are also business-driven but at the local level. The WVWFDB will implement a model to standardize the delivery of products and services to businesses. Regional business service teams will be developed to coordinate needs and provide contacts to local employers. The State realizes the importance of capacity building that supports the service to provide timely solutions and connections to available resources to meet business needs. Collected information can be tracked and shared on the statewide data system to minimize duplication.

On-the-job training (OJT) providers throughout the state will also be contacting employers and advising them of the services provided through the workforce system.

WFWV is a One-Stop center for workforce resources, including the state's largest online database of job seekers, assistance with worker training, and unemployment processing.

Employers can post job listings, search for qualified employees, analyze Labor Market Information (LMI), and locate business services.

DRS will continue to provide leadership for accessibility standards, disability talent recruitment, and accessibility issues.

DRS employment specialists continuously collect employment information from their business contacts. This information, including job orders for open positions, is immediately input into the WFWV's online MACC system, and shared within the WDS.

DRS will continue to serve on Business Service Teams (BSTs) with WFWV, LWDBs, and other related entities. Through training and standardizing informational materials, when possible, these teams provide a full range of WDS information when making visits to employers. This will allow the WDS to maximize the impact of employer visits and ensure that businesses are aware of all resources available through the WDS.

Adult Education will develop, and support career pathways identified by employers and the workforce system. This support will be provided by developing and implementing bridge and pre-bridge programs. Career pathways systems assist youth and adults to achieve success in postsecondary education training and employment in high growth and high demand occupations.

Adult Education partners with several community colleges and CTE programs to offer credentials that demonstrate measurable skill gains and are part of a clearly defined career pathway for individuals with barriers to employment.

Our goal is to strengthen West Virginia's business climate by supporting employers and helping job seekers gain the skills and knowledge required to obtain employment, remain employed, and advance in their careers.

Career Technical Education (CTE) Program Advisory Councils and Clinical Sites

All West Virginia Department of Education (WVDE) CTE programs at each school must have an advisory council in compliance with Perkins V. The majority of members must represent business/industry to identify local labor market demand, program curriculum and certification needs, and guide program improvements. Advisory employers also provided onsite clinical experiences for high school CTE students enrolled in health therapeutics and adult CTE students in Practical Nursing programs.

Business and industry representatives inspect Simulated Workplace classrooms to ensure alignment with the industry needs. These representatives evaluate the career technical education program facilities, safety, equipment, space, tools, supplies, technology, professional skills, customer service, and teaching materials using a scorecard. Results are communicated to the administrators and teachers. The business inspector scorecard is located at <http://wvde.state.wv.us/simulated-workplace> and <https://wvace.us>.

Learn & Earn

With the Learn & Earn program, the community and technical colleges have a 50/50 partnership with employers where the students actually work on-site 50 percent of their time and spend the other 50 percent in a classroom setting.

Business Surveys

West Virginia plans to design and conduct business surveys in order to gather information on business needs and aims to make the statewide business survey a regular exercise in order to ensure that service and workforce training is relevant and responsive to the needs of the business community.

Consumers of the state's American Job Centers (AJC), including those with disabilities, frequently require additional training in order to meet employer needs and reach their employment goal. Often, this training is provided by community colleges and vocational/technical training schools located throughout the state. West Virginia's Community and Technical College System (CTCS) has an excellent track record of training individuals to have the skills that employers need to fill high quality jobs.

Through its employer partnership programs, West Virginia's CTCS can provide the training an individual needs while leveraging a company's training dollars to maximize worker productivity. The CTCS delivers training to hundreds of employers across the state and can provide customized training, skill enhancements, certificate, and associate degree programs.

Employer Partnership Programs Learn & Earn

Provides students in high-demand applied technology programs with paid cooperative (co-op) educational experiences:

- 50/50 employer & CTC matching contribution
- Co-op experience must pay no less than \$10/hr.
- Employer gains a highly qualified employee and a future skilled labor pool
- Students earn valuable OJT and a living wage while attending school

Tech Scholars Program

- Provides scholarships to students who enroll in high demand, applied technology programs
- 50/50 employer & CTC matching contribution
- Must lead to a Certificate of Applied Science (CAS) or Associate of Applied Science (AAS)
- Employer benefits by investing in a skilled workforce
- Students gain much-needed financial assistance while attending school through the WV Advance Grant
- A rapid-response grant for CTCs to help employers meet an immediate training need.
- Training can include skills upgrades, customized training, or pre-employment training through the HB 3009 Workforce Development Grant.
- A grant program to help CTCs deliver training to business and industry

- Company cash-match is required
- Business and CTC collaboration in training delivery

Programs like these bring together employers, individuals, and WIOA partner agencies. By identifying the needs of employers and sharing resources to train individuals, the state as a whole benefits from the West Virginia WDS. Community colleges and technical schools have a unique ability to specialize programs across the state depending on the demands of the local economy, including the needs of employers and job seekers.

As described, the West Virginia WDS benefits greatly from its partnership with community colleges and technical schools. This partnership has enhanced access to WDS services and allowed more individuals and employers to reach their goals.

In West Virginia, our workforce development system (WDS) begins with the secondary school system which includes career and technical schools through post-secondary education which include community colleges and the higher education system. All core programs work on a regular basis with all sectors of education – in particular, CTEs and CTCs. Our goals are to work even closer in the future and develop stronger relationships.

As employers and the WDS develop career pathways, the core programs will work with the education system to support them. WFWV is already partnering with the CTE in their simulated workplace program. We wish to expand this program to include older youth in the near future.

The core partners understand the importance of having a recognized postsecondary degree from the perspectives of both employers and job seekers. The state strives for quality, career- based employment outcomes for its consumers, when appropriate. In this aim, the state has a long history of providing consumers with the necessary training that leads to a recognized postsecondary credential. In FY 2019, over \$6 million in DRS funding went toward training. Of this amount, the majority was for four-year college/university and junior/community college tuition.

Core partners have a liaison with postsecondary institutions across the state including 44 colleges, universities, community and technical colleges. Furthermore, cross-training between agencies is routinely conducted at state meetings and conferences. The Higher Education Policy Commission (HEPC) is an example of an agency that cross-trains with the core partners. HEPC develops and oversees a public policy agenda for West Virginia’s four-year colleges and universities.

West Virginia Division of Rehabilitation Services (DRS)

Since the enactment of WIOA, DRS has focused on providing services, particularly Pre-Employment Transition Services (Pre-ETS), to high school students with disabilities starting in the 9th grade. To accomplish this, 59 counselors work with students with disabilities. Pre-ETS are mandated under WIOA and include the following:

- Job exploration counseling
- Work-based learning experiences, which may include in-school or after school opportunities or experience outside the traditional school setting (including internships), that is provided in an integrated environment to the maximum extent possible

- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institution of higher education
- Workplace readiness training to develop social skills and independent living
- Instruction in self-advocacy, which may include peer mentoring

DRS will continue to work closely with the West Virginia Office of Special Education to ensure that special education teachers, parents, and students with disabilities are aware of the availability of Pre-ETS. This work will continue through joint-training conferences with special education staff from across the state. Additional, intensive training on the Pathways to the Future Pre-ETS website will also continue to be provided to special education teachers in upcoming years. As part of its outreach campaign, DRS will continue to place large Pathways to the Future banners in high schools and distribute Pre-ETS materials to students with disabilities across the state. Additional outreach using large posters will target eighth grade, career and technical education, and post-secondary students at locations across the state.

In addition to Pre-ETS, DRS debuted the POWER program in 2015. POWER is a job shadowing program that offers transitioning students, who may be having a difficult time choosing a career path, the opportunity to experience an occupation by spending time with a professional working in the students' vocational goal/career field of interest, including STEM. The POWER program allows the student the opportunity to experience an occupation prior to committing to training. It guides the student to take a serious, realistic look at the occupation, allowing the student to make a more informed choice.

Another DRS activity is STEP. This program utilizes school personnel to facilitate a more seamless transition from high school to post-secondary activities (employment or training) for students with disabilities. By allowing the student to continue working with an individual who has provided them with classroom instruction and/or transition services while in high school, they are working with people who are most familiar with their interests, skills, and barriers to employment. In addition, STEP will also include the use of science and math teachers to provide appropriate students with further career exploration opportunities in STEM fields. These teachers may also provide college preparation activities, such as ACT test preparation, and work-based experiences.

By engaging students with disabilities earlier and providing them with activities such as Pre-ETS, STEP, and POWER, DRS expects recipient students will have a better understanding of the labor market and the value of obtaining a postsecondary credential. Students with disabilities who are eligible for Vocational Rehabilitation services may, in accordance with their IPE, receive assistance from DRS in obtaining postsecondary training.

The core partners meet on a monthly basis to discuss all aspects of the system. Based on future directives from federal guidelines and procedures developed by the WVFDB, the other mandatory partners will enter into MOUs at the local level as to how they will coordinate and provide services to customers at the local level.

West Virginia's workforce development strategy is integrally tied to education, starting with the secondary school system, including Career and Technical Education (CTE) centers, and continuing through postsecondary education to include community colleges as well as public and private colleges and universities. Adult Education as a core partner is fully engaged with all levels of education within the state.

In West Virginia, Secondary CTE is delivered through comprehensive high schools, county CTE centers, and multi-county CTE centers. Post-secondary CTE is delivered through the State's Community and Technical College System (CTCS). County CTE centers also provide postsecondary CTE instruction.

The core programs will work with the education system to support and develop career pathways identified by employers and the workforce system. The state will be partnering with several community colleges to develop micro-credentials that demonstrate measurable skill gains and are part of a clearly defined career pathway for individuals with barriers to employment. Because the community colleges are Strengthening Career and Technical Education Act for the 21st Century (Perkins V) postsecondary recipients, the model developed by these community colleges will serve as a model that can be replicated by all of the Perkins V postsecondary recipients across the state. In addition, many of the approved secondary CTE programs of study will offer badges to recognize incremental attainment of skills. Badges are earned when a student achieves a minimum score on the technical assessment. A digital badge is an electronic indicator of one's skills, performance, and achievement.

In collaboration with WVDE, providers of CTE programs of study have worked to align industry credentials to high-demand occupations. Secondary career and technical centers make appropriate credentials and micro-credentials available through end-of-program assessment.

Another key area of collaboration and cooperation is the transition from the workforce development program to postsecondary education. Title II program managers, DRS counselors, SPOKES student coordinators and WIOA and Wagner-Peyser employment specialists are establishing relationships with educational staff in Adult Education programs to support the successful transition of their customers to postsecondary programs. The postsecondary programs include those offered by Perkins V postsecondary recipients.

All West Virginians exiting Adult Education services will be prepared to participate successfully in postsecondary level instruction. To support this vision, adult education providers have implemented the College and Career Readiness Standards for Adult Education. At the local level, many adult education providers have developed relationships with postsecondary education providers in the CTE centers and community colleges. Students who do not earn a high enough score on placement tests at the postsecondary institution are referred to a local adult education program for remedial work. After the student has demonstrated sufficient academic progress at the local adult education program, as determined by an approved standardized test, the student is referred back to the postsecondary institution. The state will build on best practices developed through these relationships. For example, in the most successful partnerships, both the adult education program and the postsecondary institution have points of contact for referrals. Also, the adult education and postsecondary programs are working together to identify key content areas for the adult education program to cover to support successful transition to the postsecondary program.

The State will strive to connect youth and adults seeking postsecondary education with available financial aid. The State will also encourage those students without a high school diploma or recognized equivalent deemed eligible under Ability to Benefit for financial assistance to enroll in eligible career pathway programs. Contextualized instruction will also be used as a mechanism for encouraging students without a high school diploma or recognized equivalent to enroll in eligible career pathway programs in providing integrated basic education and skills training for adults with basic skill deficiencies, and a proven skills-building strategy. Post-

secondary career and technical education programs will work with adult basic education programs to establish integrated education and training programs throughout the state.

In serving individuals with disabilities, DRS will continue to work collaboratively with local community colleges, career and technical schools to explore the development of training programs that are implemented with universal design to train individuals with disabilities for competitive, integrated employment in jobs that meet local labor market demand. This will include working to replicate successful programs and to expand postsecondary education options for youth with disabilities. DRS will also work to develop and implement interagency agreements with community colleges and career and technical schools to fill unmet needs within the local WDS.

In serving veterans, DRS will continue to work closely with the WVDE and student veteran organizations at colleges, universities, trade schools and other institutions of higher learning to create “veteran friendly” learning environments. The state will continue to support partners in education with focused outreach and coordination with community partners while supporting veterans and their family members to take full advantage of educational benefits that they have earned. This alignment of services will leverage these education and training platforms to focus on job skills that meet the needs of employers within the regions. Education will coordinate with partners to link employers to these educational institutions and programs to ensure that we graduate skilled applicants who have the greatest potential to move successfully into employment.

Coordinating with Economic Development Strategies

Through its Employer Partnership Programs, West Virginia’s CTCS provides the training that workers need while leveraging the company’s training dollars to maximize worker productivity.

West Virginia is leveraging investments to enhance access to workforce development programs through various initiatives. Some examples are below:

CTE plays a critical role in the state’s economy. West Virginia is fortunate to have an adult career technical system that produces highly skilled students who will be the face of West Virginia’s trained workforce. Adult Education is collaborating with CTE to address the issues of increasing successful postsecondary enrollment of adult students in CTE programs and improving persistence toward completion once successfully enrolled. This collaboration will include shared intake and assessment as well as dual enrollment in linked basic skills and occupational courses, integrated, contextualized instruction and wrap-around services for students. These programs will combine basic skills and career-technical content, including general workforce readiness skills, academic and English language skills, and specific occupational knowledge and skills, supported by comprehensive student services along a well-defined career pathway.

Adult Education has a successful history of collaboration with the State’s Department of Health and Human Resources (DHHR). Through a cooperative relationship built on trust and commitment to serving economically disadvantaged West Virginians, the two State agencies work together to respond to the mandates of welfare reform. SPOKES, an academic and job preparation skills program, was created by Adult Education under a contract between the WVDE, Office of Adult Education and Workforce Development and DHHR, as well as in collaboration with some of the Local Workforce Development Boards (LWDBs). The SPOKES program model was also designed to provide intense daily activities that would address academic and soft skills necessary for adults to pursue gainful employment. In addition, students

may select certification training from a list of state-approved and industry recognized certifications as a part of this program.

In partnership with workforce education and adult education, training delivered through West Virginia Advanced Technology Grants at BridgeValley Community College is market-driven and focused on providing employers with a highly trained workforce and complementing the economic development efforts of the state. The intent is to provide training services to employers that have a positive economic outcome on the State as determined by the West Virginia Development Office.

As discussed in the Strategic section of this plan, the State will use data and work with employers to identify the skills and competencies necessary to attain family-sustaining employment and will offer high quality training to individuals to obtain those skills. The state will also work closely with employers, Industry Partnerships and LWDBs to identify or develop the badges, micro-credentials, certifications, and other credentials that adequately represent attainment of those skills.

The State will work to identify and align credentials to career pathways for high-demand and priority occupations. Adult Education is also exploring the use of micro-credentials, particularly for individuals with barriers to employment, as a means to allow for the attainment of skills in shorter segments and the receipt of an industry-recognized credential to demonstrate skill competency to potential employers. In addition, students enrolled in WVDE-approved CTE programs will soon be able to earn badges. Badges are earned when a student achieves a minimum score on the technical assessment. A digital badge is an electronic indicator of one's skills, performance, and achievement.

In accordance with the Strengthening Career and Technical Education Act for the 21st Century (Perkins V), West Virginia requires postsecondary institutions receiving Perkins V funding, including the nine community colleges, to articulate with secondary schools that offer WVDE-approved CTE programs of study.

These articulation agreements allow qualified students enrolled in an approved career and technical Program of Study to receive college credit toward a diploma, certificate or degree in a similar program at a postsecondary institution. These programs serve as a seamless pathway from secondary to postsecondary education and ensure students transition from one level to another without delays or duplication of learning.

The state will promote the attainment of postsecondary credentials through a number of programs and initiatives. Examples include:

- All training providers will be required to describe the credential(s) to be earned. All Perkins V postsecondary recipients report on credential, certificate or degree earned as part of their required accountability measures.
- Business and industry partners encourage/collaborate training that results in a postsecondary credential by requiring all proposals to identify credentials/certifications to be obtained and making credentials a required outcome measure.
- DRS will continue to analyze labor market demand and model service delivery systems to identify opportunities for industry-recognized certificates that lead to increased and improved employment outcomes for individuals with disabilities.

- Education programs, including secondary and postsecondary Perkins V and adult basic education, will provide professional development opportunities to help providers understand and navigate the full credentialing spectrum and develop expertise in occupational counseling.

All postsecondary institutions with Perkins V funding have advanced credit offerings aligned with at least one approved CTE program of study and offer additional advanced credit opportunities. Students can earn between two and 22 college credits for their secondary technical coursework, before high school graduation, as permitted in the specific CTE approved program of study and the Perkins V Statewide Articulation Agreement.

Since the enactment of WIOA, DRS has focused on providing services, particularly Pre-ETS, to high school students with disabilities starting in the 9th grade. To accomplish this, 59 counselors work with students with disabilities. Pre-ETS are mandated under WIOA and include the following:

- Job development counseling
- Work—based learning experiences, which may include in-school or after school opportunities or experience outside the traditional school setting (including internships), that is provided in an integrated environment to the maximum extent possible
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institution of higher education
- Workplace readiness training to develop social skills and independent living
- Instruction in self-advocacy, which may include peer mentoring

In addition to Pre-ETS, DRS debuted the Positive Outcomes within Education and Rehabilitation (POWER) program in 2015. POWER is a job shadowing program that offers transitioning students, who may be having a difficult time choosing a career path, the opportunity to experience an occupation by spending time with a professional working in the students' vocational goal/career field of interest, including STEM. The POWER program allows the student the opportunity to experience an occupation prior to committing to training. It guides the student to take a serious, realistic look at the occupation, allowing the student to make a more informed choice.

Another DRS activity is STEP. This program utilizes school personnel to facilitate a more seamless transition from high school to post-secondary activities (employment or training) for students with disabilities. By allowing the student to continue working with an individual who has provided them with classroom instruction and/or transition services while in high school, they are working with people who are most familiar with their interests, skills, and barriers to employment, especially those with disabilities. In addition, STEP will also include the use of science and math teachers to provide appropriate students with further career exploration opportunities in STEM fields. These teachers may also provide college preparation activities, such as ACT test preparation, and work- based experiences.

By engaging students with disabilities earlier and providing them with activities such as Pre-ETS, STEP, and POWER, DRS expects recipient students will have a better understanding of the labor market and the value of obtaining a postsecondary credential. Students with disabilities

that are eligible for VR services may, in accordance with their IPE, receive assistance from DRS in obtaining postsecondary training.

Economic development strategies are primarily developed and implemented by the West Virginia Development Office. The Development Office works closely with WFWV, CTCs, CTEs, and Higher Education in evaluating labor market resources to present to current and potential business entities.

West Virginia has local economic and community development offices throughout the state. The WDS works closely with these local entities in an effort to promote economic development.

Furthermore, these entities all participate in West Virginia's business service model. This model is a collaborative effort to identify and address the needs of the business community in each Workforce region. The Workforce Development System, the MACC, is the repository of data available to coordinate the service delivery.

B. STATE OPERATING SYSTEMS AND POLICIES

The WorkForce West Virginia (WFWV) MACC system is a comprehensive case management system that incorporates many of the programs available under WIOA, including Wagner-Peyser, Adult, Dislocated Workers, Youth, Trade Act, National Dislocated Worker Grants, Rapid Response, Jobs for Veterans State Grants, Migrant and Seasonal Farm Workers, and the Eligible Training Provider List.

The core partners have developed interfaces between the WFWV MACC system, the Adult Education AEMIS system, and the Division of Rehabilitation Services (DRS) iECM system that allows co-enrollment of individuals under three core partners and the real-time sharing of participant activities in the respective systems. This allows case managers to immediately know what services are being provided to the participant as well as follow up, performance and other informational needs. The core partners will share common data elements with other core partners through the interface system. All partners will have one goal: to ensure individuals receive needed training and obtain employment.

Labor market information is provided to data seekers through the website of the Division of Research, Information and Analysis. Data seekers can go directly to the website at lmi.workforcewv.org or can gain access to it through the Agency website.

The Division of Research, Information and Analysis meets the needs of data seekers by completing specific data requests, as well as by offering specific data such as In-Demand Occupations and Occupational Projections and Wages on the website.

West Virginia has an integrated data collection and performance management system (MACC) that covers the following programs:

- WIOA Adult, Dislocated Worker, Youth
- National Dislocated Worker Grants
- Migrant and Seasonal Farmworkers
- Wagner-Peyser
- Trade Adjustment Assistance
- Jobs for Veterans State Grants

- West Virginia's Unemployment Compensation Management Information System interfaces with MACC

All other partners have management information systems that are customized to meet the needs of their programs. WFWV, DRS, and Adult Education have made the necessary changes to their systems to collect the required data elements.

Common data elements are shared among the partners through a regular file exchange; to allow partners to access the information in real time. Employment and wage data will be shared with partners to the extent allowed by the State Wage Interchange System (SWIS) agreements.

To ensure alignment and integration, all core programs have mutual memorandums of understanding that help facilitate an integrated service delivery system. Staff members of each core partner will be cross-trained and knowledgeable about each core program in order to make appropriate customer referrals. The core partners will continue to maintain communication at the state and local levels on a regular basis. Common customer information and service provision data will be collected and stored in a data warehouse.

This information will be shared among the partners in order to provide better and more efficient services to individuals enrolled in one or more programs and to employers served by the system.

In compliance with WIOA, the Governor has established the West Virginia Workforce Development Board (WVWFDB) to assist in the development of this Combined State Plan that will enhance the capacity and performance of the workforce development system (WDS), align and improve the workforce programs and investments, and promote economic growth. The WVWFDB assists the Governor in achieving the State's strategic and operational vision by developing and aligning policies.

Action Plan for Policy Development

WorkForce West Virginia (WFWV) establishes policy guidance for the WDS. Moving forward, WFWV plans to implement an 8- step process for policy development.

West Virginia's 8 Step Process for WIOA Policy Development:

1. Determine policy need
2. Meet with subject matter experts
3. Policy drafting
4. Review and comment period
5. Updates to draft
6. Final approval
7. Policy dissemination
8. Policy modification when applicable

Strategic Functions

- Develop and align policies
- Develop and implement state plans and performance measures
- Develop career pathway strategies

- Develop and expand strategies for partnerships in in-demand sectors/occupations

System Alignment and Effective Operations

- Develop policies and guidance on AJC partner roles and resource contributions
- Develop strategies for aligning technology and data systems
- Develop local area allocation formulas
- Develop a statewide Labor Market Information system
- Develop strategies to support staff training and awareness
- Disseminate best practices
- Develop and continue improving the AJC system
- Support effective local boards

The State of West Virginia has been pursuing policies of coordinated and integrated workforce development since the enactment of the Workforce Investment Act (WIA). The policies embedded in the WV State Code §5B-2B-9 for the implementation of WIA still remain valid in the implementation of WIOA.

To solidify the commitment and collaborative efforts of the WIOA core and other participating state agencies at the state level, the WDS has a Memorandum of Understanding (MOU) with the Interagency Collaborative Team (ICT). This MOU details the state-level WDS vision, goals, processes, and system-wide commitments from each agency of the ICT. In conjunction with the WVWFDB, the ICT MOU delineates the State's processes for developing guidelines for the WDS, including guidelines for contributions, benchmarks, and equitable methods of infrastructure funding. All signatories to the ICT MOU agree to participate in a common referral system and all AJCs utilize a common intake/referral form. Having a universal intake process increases service availability for West Virginia WDS consumers and allows partner agencies to maximize resources and improve outcomes. Partner agencies and co-enrolled consumers also benefit from the interoperability of the core partner agencies' MIS (for additional information, please see section III.b.6.A.i). The WDS is in the process of updating the ICT MOU, to embody State policies that will support the implementation of the State's strategies set forth in this WIOA Combined State Plan. The ICT MOU will serve to support the implementation of the State's goals of: 1) Maximize Efficiency of the WDS 2) Strengthen Relationships with Employers 3) Overcome Employment Barriers of Individuals 4) Promote Career Pathways 5) Identify and Maximize Postsecondary and Employment Opportunities for Youth 6) Closer Align West Virginia's Labor Force Participation Rate with the National Labor Force Participation Rate.

WFWV also provides guidance to assist local boards, chief elected officials, and AJCWV partner programs in determining equitable and stable methods of funding infrastructure outlined WIOA policy 06-17 titled Memorandum Of Understanding/Infrastructure Guidance https://workforcewv.org/images/files/PublicInfo/guidance-notice/WIOA_Policy_6-17_Memorandum_of_Understanding_-_Infrastructure_Guidance.pdf.

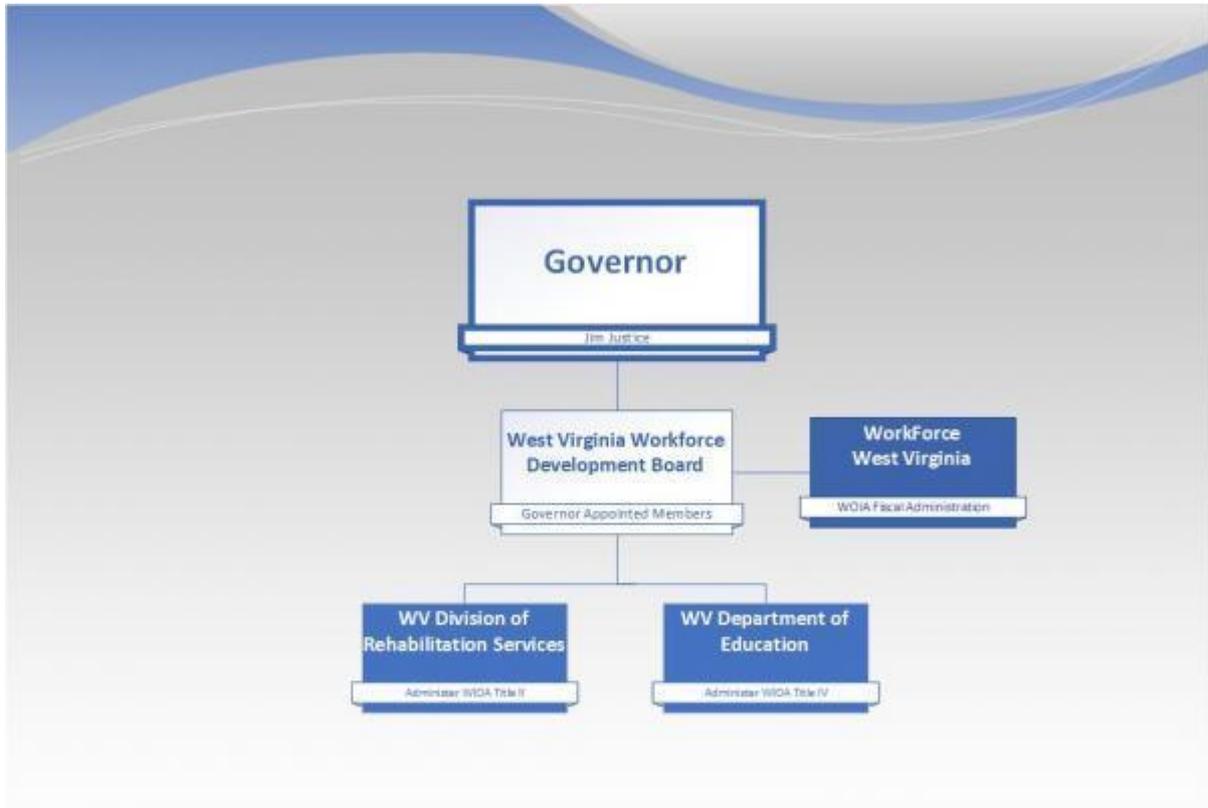
WorkForce West Virginia (WFWV) is the state agency responsible for the administration and oversight of all WIOA programs under Title I and III. The West Virginia Division of Rehabilitation Services (DRS) is the state agency responsible for the administration and oversight of WIOA programs under Title IV. Title II Adult Education is administered under the West Virginia Department of Education (WVDE).

All agencies work closely with the state workforce development board: the West Virginia Workforce Development Board (WVWFDB). The WVWFDB advises the Governor on workforce priorities and initiatives while also overseeing workforce activities managed regionally by Local Workforce Development Boards (LWDBs). A few of the many responsibilities the WVWFDB is charged with includes developing opportunities for West Virginians to gain employment and earn competitive wages, developing and implementing workforce solutions based on the input of representatives and LWDBs around the state, addressing West Virginia's workforce needs through efficient workforce training and development programs. The WVWFDB also works with the West Virginia Department of Education (WVDE) and DRS in developing and implementing the federally mandated state plan under WIOA. At the regional level, West Virginia has a total of seven designated local regions with a LWDB in each. LWDBs are responsible for the oversight of WIOA funds and activities, delivering career assessment, job search, and education and training related services through organizations identified and established by the board.

The Executive Branch of West Virginia's State Government is headed by the State's elected Governor, who directly oversees several State Departments, Bureaus, Commissions, and other Boards and Councils. The implementation of WIOA in the State of West Virginia is carried out by two departments: The Department of Commerce and The Department of Education.

The Department of Commerce consists of nine agencies, including the Development Office; Division of Forestry; Geological and Economic Survey; Division of Labor; Office of Miners' Health, Safety, and Training; Division of Natural Resources; West Virginia Tourism Office; the West Virginia Division of Rehabilitation Services; and WorkForce West Virginia. WFWV provides workforce development services statewide at American Job Centers distributed through seven geographic regions.

The West Virginia Department of Education consists of the State Board of Education, Office of the Superintendent's Office and the following divisions: Teaching & Learning, Support & Accountability, and Technical Education & Governor's Economic Initiatives. The Division of Technical Education & Governor's Economic Initiatives houses the Office of Adult Education.



The Board shall assist in implementing and overseeing a comprehensive state workforce system that prepares West Virginia citizens for employment opportunities offered by West Virginia businesses. The Board shall make recommendations regarding program implementation, operation, and modifications to all state agencies administering workforce investment programs. The Board shall also assist and encourage West Virginia's educational institutions and public assistance systems to improve their ability to prepare people for gainful employment.

The Governor appoints the members of the WVWFDB and designates one of the business representatives to serve as the Chairperson. The WVWFDB gives the Chairperson authority through the bylaws to create or dissolve committees and the task forces in order to accomplish the state board functions of the WVWFDB as required under section 101 (d) of WIOA. The general WVWFDB meetings are scheduled to occur every quarter. Significant decisions are made with the approval of a simple majority of a Board quorum. Status updates on any current initiatives are given, as appropriate, to the full Board during regular meetings and if action is required, the Board is able to act accordingly. Public notice of regular Board meetings will be provided to all members no less than seven days before the day of the meeting. All meetings of the Board will be publicly announced in advance and open and accessible to the general public.

All agencies work closely with the state workforce development board, referred to in West Virginia as the WVWFDB. The WVWFDB advises the Governor on workforce priorities and initiatives while also overseeing workforce activities managed regionally by WVDE and DRS in developing and implementing the federally mandated state plan under WIOA. LWDBs are responsible for the oversight of funds and activities, delivering career assessment, job search,

and education and training related services through organizations identified and established by the board.

West Virginia Workforce Development Board GOVERNOR APPOINTED JULY 1, 2021:



Scott A. Adkins, Acting Commissi

West Virginia Workforce Development Board 2021-2023 Board Members

MEMBER NAME	STATUTORY REQ	COMPANY	TERM END
John Sorrenti – Chair	Business Rep	John Jay Consulting	6/30/2021
Helen Marie Gibson-Beaver	Business Rep	Rea of Hope, Inc	6/30/2021
Ray Burke, Jr.	Business Rep	Better Foods, Inc	6/30/2022
Lee Ann Belmont	Business Rep	WV American Water	6/30/2022
Paul Geoffrey Sawyers *	Business Rep	Alleward Sogefi	6/30/2019
Michael Sirockman	Business Rep	Covestro LLC	6/30/2023
Michael Bombard	Business Rep	Bombardier Commercial Aircraft	6/30/2023
Bryan Johnson	Business Rep	Network Innovation Solutions	6/30/2023
Diane Strong-Treister	Business Rep	Manpower	6/30/2021
Penny Brown	Business Rep	Broadus Hospital	6/30/2021
Stephanie Smith	Business Rep	NGK Spark Plug Mfg.	6/30/2022
Natalie Oliverio	Business Rep	Military Talent Partners	6/30/2021
Heather Vanater	Business Rep	AEP Appalachian Power	6/30/2021
Steve Cox	Business Rep	Toyota Motor Mfg.	6/30/2023
Brian Ulery	Business Rep	Thomas Hospital	6/30/2023
Roy Hamilton	Business Rep	Farmers Bank	6/30/2022
Traci Leigh Nelson	Business Rep	OMEGA	6/30/2023
Todd Shell *	Business Rep	Guyan International	6/30/2020
Sarah K. Boley	Business Rep	Wetzel County Hospital	6/30/2022
VACANT	Business Rep		
Josh Sword	Labor Rep	AFL/CIO	
Jeffrey Scott Rowe	Labor Rep	WV State Bldg. Trades	6/30/2022
Brian Keith Stanley	Labor Rep	International Un of Painters & Allied Traders	6/30/2023
Eunice Bellinger	Comm & Tech College	BridgeValley CTC	6/30/2021
Kim Tieman	Community Based Organization	Benedum Foundation	6/30/2021
Reverend Matthew Watts	Youth Organization	HOPE Community Development Corp	6/30/2021
John Moses	Youth Organization	Youth Services System	6/30/2022
Michelle Foster	Youth Organization	Greater Kanawha Valley Foundation	6/30/2023
Stephanie Ahart	Youth Organization	Human Resources Development Foundation (HRDF)	6/30/2021
Robert Andrew Skidmore	Local Elected Official / County	Putnam County Commission	6/30/2021
Randall (Randy) Rapp	Chief Elected Official / City	Mayor of Vienna	6/30/2023
Myisha Robinson	Government Official	Bureau of Senior Services	6/30/2023
Scott Adkins	Government Official	WorkForce West Virginia	6/30/2023
Bill Crouch / Designee	Government Official	Dept of Health & Human Resources	6/30/2023
Clinton Burch / Designee	Government Official	Department of Education	6/30/2023
Marijane Waldron / Designee	Government Official	Division of Rehab Services	6/30/2023
Chandler Swope	Member WV Senate	State Senate	
Paul Espinosa	Member House of Delegates	House of Delegates	

The Board shall meet at least quarterly and as such other times as the Chairperson deems necessary. All meetings of the Board will be publicly announced in advance and shall be open and accessible to the general public. Special meetings of the Board may be called by the Chairperson upon notice to the Board two working days prior to the meeting. Notice of each special meeting shall state the date, time, and location (within the State of West Virginia) of the meeting, and an agenda will be included stating the purpose of the meeting. Such special

meetings will comply with the West Virginia Open Meetings law. At any special meeting of the Board, no business other than the stated agenda shall be transacted.

Additional board activities include:

1. Work in the development of and continuous improvement of the workforce system in West Virginia to include the removing barriers to employment, enhance existing strategies to support career pathways, provide outreach to employers to educate them on workforce services, enhance current sector partnerships to serve the needs of employer and job seekers.
2. Recommend improvements to the AJC system through the local workforce regions to support enhanced delivery of services to individuals and employers.
3. Disseminate best practices related to effective operation of the AJC system and training programs that respond to real time labor market analysis to assist in placement into employment.
4. The review of statewide policies that affect the provision of services in the AJC system, roles of mandated partners and guidance for allocation of funds to support the system.
5. Recommend enhancements and technological improvements for better access to services and activities delivered in the AJC system.
6. Recommend strategies for aligning technology and data systems among the mandated partner programs to improve the capacity to produce the desired results in reporting performance accountability measures.
7. Recommend enhancements to the statewide LMI system under the Wagner-Peyser Act.
8. Recommendations for other policies that promote unified initiatives to improve the WDS.

Each of the core partners, including WFWV, DRS, and Adult Education will be assessed based on the performance accountability measures to assess the quality, effectiveness and improvements of the programs by local area or provider. Core programs will be assessed each year primarily through the State performance accountability measures described in section 116(b) of WIOA. The assessments will be conducted at the state, local, and regional levels, while taking into account local/regional planning goals, as appropriate. The WV WDS "data warehouse" ensures that the state will have the capability to conduct assessments at various levels across programs in addition to assessments of the system as a whole. Assessments will help the state maintain focus on service quality, progress towards its goals, identify promising practices, and pinpoint areas in need of improvement.

Each core program will be assessed on the following performance measures from section 116(b) of WIOA:

- Employment (second quarter after exit)
- Employment (fourth quarter after exit)
- Median earnings (second quarter after exit)
- Credential attainment rate
- Measurable skills gains

- Effectiveness in serving employers

Additional assessments may be conducted utilizing other measures, as appropriate.

The West Virginia AJC system partner programs include the following:

- Alien Labor Certification Program
- Work Opportunity Tax Credit (WOTC)
- Adult Basic Education
- Trade Adjustment Assistance (TAA)
- Career and Technical Adult Education
- Higher Education Adult Part-time Student
- Workforce Development Initiative Grant
- West Virginia Advance Grant and Technical Program Development Initiative
- WIOA Title I Adult
- WIOA Title I Youth
- WIOA Dislocated Worker
- Governor's Discretionary Fund
- Division of Rehabilitation Services (DRS)
- Senior Community Service Employment Program
- Veterans Programs
- Labor Exchange (Wagner-Peyser)
- Community Services Block Grant
- Unemployment Compensation
- Governor's Guaranteed Workforce Program (Including Small Business Workforce Development)
- National Emergency Grants (Various)

Each year, WFWV issues an assessment of the West Virginia workforce development system- the Workforce Development System Report. This serves as the primary assessment of one-stop partner program services in the state. This report includes the State of the AJC System, the Funding Stream Report, performance requirements, positive practices, and the Interagency Collaborative Team (ICT) Memorandum of Understanding (MOU). This report is a summary document that gives a public account and assessment of the current operations, structures, activities, finances, and future direction of West Virginia's American Job Centers (AJCWV). The report is published annually, as required by the West Virginia Legislature, and reported to the Legislative Oversight Commission on Workforce Investment for Economic Development.

The purpose of the Funding Stream Report is to quantify the level of both fiscal and programmatic (service delivery) involvement of all the entities involved either directly or

tangentially with workforce development in West Virginia. The data collected for the report is critical to conducting an assessment of the AJCWV system. With the original passage of House Bill 4083 in 2002, the West Virginia Legislature required this annual report regarding the source, use and outcomes of all funds received for workforce development activities in the state.

Specifically, this reporting requirement includes:

- Source and amount of federal, state, and other funds received for workforce development activities;
- Purpose of each of the above funds;
- Services provided in each of the seven regional workforce development areas;
- The measure used to evaluate program performance (including current and baseline performance data) and any other information the council requests.

All of the publicly funded workforce development programs operating in the state are to include:

- Amount of federal funds expended by each program,
- Amount of state funds expended by each program,
- How the funds are spent,
- The resulting improvement in the workforce.

The purpose, beyond identifying sources and uses of funds, is to focus on the outcomes of workforce development. Holding agencies and programs accountable for results is vitally important. Getting the most value from the dollars invested, be it federal, state or independent grants, is critical to the success of West Virginia's workforce development system.

For each workforce development program or activity, the report includes the following:

- State Organization
- Funding Unit
- Operations Unit
- Program
- Program Type
- Program Purpose
- Target Population
- Service Level (number of individuals served)
- Evaluation Measurement (specific to each program)
- Outcome
- Service Locations
- Funds, by source

Percentage of funds used for Workforce Development

Local and Regional Planning

- Data are collected from the local one-stops within each region. The report also aggregates data by workforce development region and includes data from the previous two years for comparison and assessment purposes. A sample of the data includes:
- The number of individuals receiving services (over 100 different available services) in each region, by program
- Contributions of each partner agency and non-mandated partner programs at each one-stop and region
- Program performance for the most recent three years, including negotiated benchmarks and actual performance

System and Program Oversight

The Workforce Development System Report is provided to the Legislative Oversight Commission on Workforce Investment for Economic Development to assess the activities and outcomes of the WV WDS. The report allows the governor, legislators, agency and program administrators, and other stakeholders to assess performance and develop appropriate, data-driven planning goals. Due to the comprehensive data collection, activities are being reported at the local, regional, and state levels to facilitate administrators' ability to examine and compare performances at various levels and across areas.

WFWV has overall responsibility for the process to collect the Funding Stream Report information and provide to the West Virginia Workforce Development Council the information needed to report to the legislature, Governor's Office and others. WFWV works with the ICT as the central clearinghouse for identifying, collecting and reporting the information.

The Governor and the West Virginia Secretary of Commerce created a taskforce to assess the West Virginia WDS and related areas such as business and workforce climates, workforce participation rates, training and educational needs, skill gaps, workforce development strategies, and how the West Virginia Combined State Plan can effectuate positive change in areas that adversely affect business. The taskforce is comprised of representatives of all core partner agencies, the state legislature, business owners, community partners, and other stakeholders. Prior to the development of the West Virginia Combined State Plan, the taskforce conducted a review of West Virginia WDS activities, including surveys of stakeholders and economic analyses. Based on their findings, the taskforce assisted the West Virginia WDS with both the development of new and the revision of existing goals and strategies.

In addition to overall WDS assessments, individual agencies conduct evaluations on the effectiveness of their programs and use the findings to make improvements. For example, DRS conducts various assessments of the effectiveness of its program, including the Comprehensive Statewide Needs Assessment (CSNA) and the Consumer Satisfaction Survey. The latest CSNA and Consumer Satisfaction Survey results are available in the VR Section of this Combined State Plan. DRS also maintains its commitment to meeting WIOA Performance Indicator benchmarks and continues to establish baseline levels of performance on five of the six WIOA Performance Indicators. For the Measurable Skills Gains performance indicator, DRS has a negotiated level of performance of 41% for Program Year (PY) 2020 and 42% for PY 2021. DRS expects to submit

expected levels of performance on the remaining performance indicators (with the exception of Effectiveness in Serving Employers) in the Combined State Plan submitted prior to PY 2022.

Selected research and improvement projects will be aligned to strategies in this plan and monitored by the core program planning workgroup. This workgroup will consist of members appointed by each of the core partner directors. To select projects, the core program partners will utilize the WVFDB to recommend areas for analysis or improvements. These projects would be approved by the leadership of the core program partner agencies and coordinated with the Secretaries of the Departments of Labor and Education.

DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

FOR TITLE I PROGRAMS

Youth Activities in Accordance with WIOA Section 128(b)(2) or (b)(3)

Once the TEGl has been issued and WFWV has received the Notice of Obligation (NOO) from the USDOL, information is gathered from our Research, Information, and Analysis (RIA) to begin the allocation process. The data received from RIA breaks out the unemployment numbers and 'economically disadvantaged youths' by county and region.

Each region is guaranteed to receive no less than 90 percent of the average allocation percentage of the local area for the prior two years. Per the guidance in the TEGl and WIOA Regulations, the remaining funds after the 'hold harmless' portion of the allocation has been calculated, are broken down by unemployed, excess unemployed, and economically disadvantaged youth.

Adult and Training Activities in Accordance with WIOA Section 133(b)(2) or (b)(3)

WFWV follows the same guidelines for allocating Adult funds as used in Youth funds except for 'economically disadvantaged adult' versus 'economically disadvantaged youth.' Each region is guaranteed to receive no less than 90% of the average allocation percentage of the local area for the prior two years.

Dislocated Worker Employment and Training Activities in Accordance with WIOA Section 133(b)(2) and Based on Data and Weights Assigned

The funds distributed for the Dislocated Worker (DW) are based on different factors than utilized for Youth and Adult. The 'hold harmless' provision is not taken into account for the dollars distributed.

Each region is guaranteed to receive no less than 90% of the average allocation percentage of the local area for the prior two years.

The entirety of the DW funds are distributed based on the categories and the percentages for each category as listed below:

1. Insured unemployment data 20.0%
2. Unemployment concentrations 20.0%
 - a. Annual average count of unemployed
 - b. Annual average unemployment rates
 - c. Index to state rates
3. Plant Closings and mass layoff data: 15.0%

- a. Initial claims in MLS
 - b. Exhaustees involved in MLS
- 4. Declining industries data 5.0%
- 5. Farmer-rancher economic hardship data
 - a. Percentage of delinquent loans to the estimated number of farms. Base data provided by FHA and US Department of Commerce Census of Agriculture.
- 6. Long-term unemployment data: 40%
 - a. Last pays from UC 217 report

FOR TITLE II

Methods and Factors for Title II

West Virginia Adult Education will conduct a competition for new Adult Education and Family Literacy Act (AEFLA), Corrections Education and Integrated English Literacy and Civics (IELCE) Education grants. In accordance with 34 CFR part 463, Subpart C, a multi-year grant will be awarded through a Request for Proposal (RFP) process; the first year being the grant award with subsequent renewal years. All eligible applicants will respond to the statewide RFP announcement and will be expected to address the thirteen considerations and seven requirements established in Section 231 (e) of WIOA.

Section 231 (e) CONSIDERATIONS. -In awarding grants or contracts under this section, the eligible agency shall consider-

1. the degree to which the eligible provider would be responsive to-
 - a. regional needs as identified in the local 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 have low levels of literacy skills; or who are English language learners;
2. the ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;
3. past effectiveness of the eligible provider in improving the literacy of eligible individuals, to meet State-adjusted performance levels, especially with respect to eligible individuals who have low levels of literacy;
4. the extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan, 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 and appropriate, including scientifically valid research and effective educational practice;
7. whether the eligible provider's activities effectively use technology services and delivery systems including distance;
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 well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality development, including through electronic means;
10. whether the eligible provider's activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with postsecondary educational institutions, institutions of higher education, local workforce investment boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways;
11. whether the eligible provider's activities offer flexible schedules and coordination with Federal, State, and local support services (such as child care, 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 and to monitor program performance; and
13. whether the local areas in which the eligible provider is located have a demonstrated need for additional English language acquisition programs and civics education programs.

Section 232 of the act states that each eligible provider desiring a grant or contract from an eligible agency shall submit an application to the eligible agency containing such information and assurances as the eligible agency may require, including-

1. a description of how funds awarded under this title will be spent consistent with the requirements of this title;
2. a description of any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities;
3. a description of how the eligible provider will provide services in alignment with the local plan under section 108, including how such provider will promote concurrent enrollment in programs and activities under title I, as appropriate;

4. a description of how the eligible provider will meet the State adjusted levels of performance described in section 116(b)(3), including how such provider will collect data to report on such performance indicators;
5. a description of how the eligible provider will fulfill one-stop partner responsibilities as described in section 121(b)(1)(A), as appropriate;
6. a description of how the eligible provider will provide services in a manner that meets the needs of eligible individuals; and
7. information that addresses the considerations described under section 231(e), as applicable

The RFP is the mechanism through which Adult Education will identify, assess, and award multi-year grants to eligible providers throughout the state that have demonstrated effectiveness in providing adult education activities to eligible individuals. An eligible individual is identified as an individual who has attained 16 years of age; who is not enrolled or required to be enrolled in secondary school under state law; and 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.

Programs previously funded by Adult Education will be evaluated for their ability to meet designated state performance measures. Applicants not previously funded by Adult Education will be required to provide data that demonstrate their past ability to achieve success in comparable measures. For both groups, these measures include effectiveness in helping students develop their academic skills, achieve high school equivalency, and transition into employment and/or postsecondary education and training.

Eligible providers submitting applications to Adult Education may include:

- a local education agency;
- a community-based or faith-based organization;
- a volunteer literacy organization;
- an institution of higher education;
- a public or private nonprofit agency;
- a library;
- a public housing authority;
- a nonprofit institution with the ability to provide adult education and literacy services;
- a consortium or coalition of agencies, organizations, institutions, libraries, or authorities described above; and
- a partnership between an employer and an entity described above.

Local grants will be distributed based on the ability to meet the requirements of AEFLA purposes outlined in WIOA:

- Assist adults to become literate and obtain the knowledge and skill necessary for employment and economic self-sufficiency;

- Assist adults who are parents or family members become a full partner in the education development of their children;
- Promote transition from adult education to post-secondary education and training through career pathways;
- Assist immigrants and English language learners improve reading, writing, math, speaking and comprehending the English language and acquire understanding of American government, individual freedom, and responsibilities of citizenship.

As part of the application process, applicants will be required to submit applications to LWDB for review to ensure that the applications align with the local plan. Adult Education will consider the review and any recommendations made by the LWDBs when scoring the related sections of the applications.

Adult Education will ensure that the same grant announcement is made available to all eligible providers. When the RFPs are ready for release, an official press release containing information about the availability of funds and the application process will be published as a legal notice in compliance with the WVDE Office of Communication's approved policies and procedures. The RFPs will be posted on the WVDE website for download.

Submissions from eligible applicants will be reviewed for completeness, adherence to grant guidelines, content development, and overall quality. A review committee will score each application and make funding recommendations. Final funding decisions will be made by Adult Education staff based on the review committee's recommendations.

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

Not Applicable.

PROGRAM DATA

The State board is fully committed to the goal of aligning technology and data systems across required one-stop partner programs. The board will continue to make this a priority at its quarterly meetings to ensure progress is being made toward the governor's vision for data alignment.

West Virginia has an integrated data collection and performance management system (MACC) that covers the following programs:

- WIOA Adult, Dislocated Worker, Youth
- National Dislocated Worker Grants (NDWG)
- Migrant and Seasonal Farmworkers
- Wagner-Peyser
- Trade Adjustment Assistance (TAA)
- Jobs for Veterans State Grants

West Virginia's Unemployment Compensation MIS interfaces with MACC.

Other partners have management information systems that are customized to meet the needs of their programs. WorkForce West Virginia (WFWV), Rehabilitation Services (DRS), and Adult Education have each made the necessary changes to their systems to collect the required data elements.

Linkages have been put in place to allow partners to access the information in real time. Employment and wage data are shared with partners to the extent allowed by the State Wage Interchange System (SWIS) agreement.

While each partner agency does have their own MIS, they are all interoperable and are able to send and retrieve data to and from each other in real time. All individuals served by the West Virginia WDS are assigned a unique identifier that is used by each partner agency. This unique identifier is used for data sharing and reporting purposes (i.e., co-enrollment with other core programs).

In addition to "behind-the-scenes" data sharing and reporting, front-end users also benefit from shared data. For example, the DRS MIS, iECM (Internet-based Electronic Case Management System), has a link in each case for "WIOA Partner Data." When a DRS Counselor clicks this link, iECM sends a request for data (using the unique identifier) to the WorkForce WV and WV Adult Education MIS. If available, the information is transmitted in real time and displayed. Information provided by partner agencies includes current and previous employment goals, services received, and assessment results. This information is then used by DRS Counselors to optimize service delivery with the goal of improving the participant's employment outcome.

The MACC is WFWV's management information system that covers all U.S. Department of Labor (USDOL) programs that we manage, except for the Unemployment Compensation systems where an interface allows for the immediate transfer of registration data from the UC benefits payment system to the MACC. All partners have added interfaces to their information system that allow the real time exchange of participant tracking information among all systems partners. The system allows case managers to streamline the intake process by eliminating the need to duplicate data that is already available in the partner systems. It also allows the tracking of an individual's participation in all programs, including what services have been given or are scheduled to be given, development plans, outcomes, and other pertinent information.

WorkForce West Virginia, Rehabilitation Services, and Adult Education have already come to a general agreement on aligning technologies and data systems. The West Virginia State Workforce Development Board will continue to work within the framework of the WIOA legislation and federal guidance to improve service delivery.

WFWV's MACC system has always been able to produce the required reports for USDOL programs in the past and we do not anticipate any difficulty in complying with the section 116 reports. While the requirement to produce reports on WIOA training performance, the MACC system has been able to track performance for participants for years. The MACC system has limited fiscal information available, which could be the basis of a fiscal management system once the requirements are established.

The WIOA core partners in West Virginia, including WFWV, DRS, and Adult Education have implemented a practical and effective system to fulfill the data alignment and integration requirements of WIOA. Each program has a unique system of data collection that is tailored to meet its unique needs. To maximize the efficient exchange of data to support assessment and

evaluation, the core partners have collaborated to develop and implement a system for data sharing. This system operates as follows:

1. Each consumer in the system is assigned a unique participant identifier upon entering the system (WFWV, DRS, Adult Education). The date each consumer enters and exits each program is recorded. The unique participant identifier and program entry/exit dates are used to identify common consumers across the core programs and provide access to the common data elements collected by other partners in the AJC system.
2. To ensure effectiveness and efficiency in the AJC system, data collected by each program on new consumers are made available for each program to track service delivery of common consumers. This process ensures that service delivery for each consumer can be tracked across all programs.
3. The data collected is used to generate reports required under section 116, performance accountability system.

Alignment of each partner's system of data collection has improved service delivery to individuals at the AJC including individuals with barriers to employment, especially those with disabilities, by providing the three core partners with more information about how consumers are being assisted across programs in the AJCWV. This information enables the core partners to have a greater understanding of how the needs of their consumers are being met across programs, to track their progress, and to minimize duplication of service. Alignment and integration of data across programs in a data sharing system supports a consumer-focused approach to service delivery that generates quality employment outcomes for consumers in the AJC.

To the extent possible, the State uses data matches with other state systems to track participants' entry and progress in post-secondary education or employment, for example using the West Virginia Department of Education's P20 system. In cases where a data match is not possible or is inadequate, case managers will work with participants, training providers, and employers to gather the needed information.

WFWV is the state agency that houses the Unemployment Compensation programs in West Virginia and has access to Unemployment Compensation wage data. West Virginia is also a member of WRIS, WRIS2 and SWIS. Wage records will be shared when possible and aggregated performance data shared when the actual wages records cannot be shared.

WorkForce West Virginia is an agency within the West Virginia Department of Commerce. This Privacy Notice Summary is based on the West Virginia Department of Commerce Privacy Policy; however, it is specific to WorkForce West Virginia.

Personal Information

- We need certain personal and non-personal information to assist you with your employment, unemployment, and training needs.
- The Personally Identifiable Information (PII) we collect may include your name, address, social security number, date of birth and more.

Uses of Information

- By West Virginia law and the Privacy Act of 1974, we must collect certain PII to assist you. Without certain PII, we may not be able to determine the services for which you are eligible, such as Unemployment Insurance benefits.
- The information we collect may be combined with information obtained from other Executive Branch Departments' websites and services.
- We use personal information for purposes that relate to the reason you provide it. If information is used for another purpose, we will obtain your permission.
- For purposes matching the reason you provided, we may share your information with other state and federal agencies for the limited purpose of data processing or storage.
- In certain cases, we may share your information when required by state or federal law.
- Your information may be shared with others we have hired to assist us; however, all staff and contractors are bound by a West Virginia Executive Branch Confidentiality Agreement.
- We do not sell or rent your PII to third parties for marketing purposes.
- We may share non-personal, aggregated, or de-identified data for purposes related to improving our business practices.

Your Rights and Choice

- You have the right to review the personal information you provide us and to update or correct that information.
- If you have consented to an electronic exchange of information, you may cancel that consent by following the instructions in the email you receive.
- If you provide any information to any of our agency websites, you may choose to remove it at any time, except where such information is required by state or federal regulation.

Security

- WorkForce West Virginia computer systems are constructed and maintained by WorkForce West Virginia agency staff, the West Virginia Office of Technology, and/or WorkForce West Virginia and state approved contractors.
- Regardless of the system or personnel responsible for it, multiple techniques and technologies are used to protect your PII. This means we use industry standards and several in-house safeguards to protect your information.

How to Contact Us

- For more information on our privacy requirements and practices, please call 800-252-5627 and your call will be directed to the WorkForce West Virginia Privacy Officer for response.

Sharing Your Information

By enrolling with WorkForce West Virginia, you agree that WorkForce West Virginia and its mandated partners may access and use all of the information contained within your application in order to best assist you in obtaining employment and in determining your eligibility for training and other services. These services may include testing, assessment, placement services

and career counseling, and we may share test scores and job eligibility data with our partners to best serve you. Personal information such as race, ethnicity, sex and disability status is being requested for federal record keeping and reporting requirements and is kept confidential; however, it may be shared with the partners to determine your eligibility for specific programs.

WorkForce West Virginia Partner Agencies

- Adult Education and Literacy Services
- Vocational Rehabilitation Services
- Post-Secondary Carl Perkins Vocational and Applied Technology Education Services
- Welfare-to-Work Funded Under Social Security Act
- Senior Community Service
- Veterans Workforce Programs
- Community Services Block Grant (Community Action)
- Job Corps
- Migrant & Seasonal Farmworker (MSFW) Services
- Temporary Assistance to Needy Families (TANF)
- Food Stamp Employment & Training
- Navigator Program

Civil Rights Statement-Equal Opportunity is the Law!

It is against the law for this recipient of Federal financial assistance to discriminate on the following basis:

- Against any individual in the United States, on the basis of race, color, religion, sex (including pregnancy, childbirth and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief;

OR,

- Against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the Workforce Innovation and Opportunity Act (WIOA), on the basis of the beneficiary's citizenship status or participation in any WIOA I-financially assisted program or activity.

The recipient must not discriminate in any of the following areas:

Deciding who will be admitted, or have access, to any WIOA Title I-financially assisted program or activity; providing opportunities in, or treating any person with regard to, such a program or activity; or making employment decisions in the administration of, or in connection with, such a program or activity; or making decisions in the administration of, or in connection with, such a program or activity. Recipients of federal financial assistance must take reasonable steps to ensure that communications with individuals with disabilities are as effective as communications with others. This means that, upon request and at no cost to the individual,

recipients are required to provide appropriate auxiliary aids and services to qualified individuals with disabilities.

If you think that you have been subjected to discrimination under WIOA Title I-funded program or activity, you may file a complaint within 180 days from the date of the alleged violation with either the recipient: Equal Opportunity Officer, WorkForce West Virginia, 1900 Kanawha Boulevard, East, Charleston, WV 25305, 304-558-1600; WV Relay 7-1-1 (TDD)

The Director, Civil Rights Center, (CRC), U.S. Department of Labor, 200 Constitution Avenue NW, Room N-4123, Washington, DC 20210, 202-693-6502; 202-693-6515 (TTY).

If you file a complaint with the recipient, you must wait either until the recipient issues a written Notice of Final Action, or until 90 days have passed (whichever is sooner), before filing with the Civil Rights Center (see address above). If the recipient does not give you a written Notice of Final Action within 90 days of the day on which you filed your complaint, you do not have to wait for the recipient to issue that Notice before filing a complaint with the CRC. However, you must file your CRC complaint within 30 days of the 90-day deadline (in other words, within 120 days after you filed your complaint with the recipient). If the recipient does give you a written Notice of Final Action on your complaint, but you are dissatisfied with the decision or resolution, you may file a complaint with CRC. You must file your CRC complaint within 30 days of the date on which you received the Notice of Final Action.

To apply for jobs you must be a United States citizen, a permanent resident alien, or be authorized to work in the United States.

WV DIVISION OF REHABILITATION

West Virginia Division of Rehabilitation Services staff are required to complete a confidentiality agreement. The agreement is utilized to ensure that all West Virginia Division of Rehabilitation Services staff with access to protected information or any other information deemed confidential, fully understand their obligations to limit their use of such information and to protect such information from disclosure. The agreement also details special attention items, as well as definitions of different types of information including personal health information (PHI), personally identifiable information (PII), sensitive personally identifiable information (SPII), and non-public personal information (NPII). The confidentiality agreement pertains to information in all forms, including electronic and paper.

WV ADULT EDUCATION

Handling Strictly Confidential Information

If a student discloses any of the following types of information (verbally or in writing), legally that information is to be considered strictly confidential and therefore "private":

- Disclosure of a diagnosed learning disability
- Disclosure of previous status as a "special education" student
- Disclosure of any other type of diagnosed physical or mental disability
- Disclosure of a diagnosed medical condition
- Disclosure of use of any prescription drugs
- Disclosure of history of drug/alcohol abuse and/or treatment

- Disclosure of status as HIV positive or of having the AIDS virus
- Official transcripts including TASC or GED® scores

Filing cabinets or drawers containing strictly confidential information must be labeled as “Confidential.” They must remain locked, must not be accessible to students or support staff, and must have a log filed foremost in each locked drawer to indicate when confidential files are accessed by any instructional or administrative staff person. The log must indicate the date, the purpose for access, and the name of the person accessing information.

Strictly confidential information files should be maintained at the local program level for a period of not less than five years and must be shredded when discarded.

Strictly confidential information regarding a student cannot be discussed, nor can any record be shared without a written release of information.

Instructors need to sign the Adult Education Personnel Confidentiality Agreement. This should be maintained by the administrator in the personnel file.

PRIORITY OF SERVICE FOR VETERANS

WorkForce West Virginia (WFWV) implements priority of service for veterans in accordance with Title 38 part III Ch. 42. 4215 via the American Job Center (AJC) sites located throughout the state. To ensure access to services for covered persons, West Virginia has established formal guidance regarding priority of service that all Wagner-Peyser and WFWV staff must follow, including determination of veteran status and eligibility. WIOA guidance notice 4-16 referencing the Workforce Innovation & Opportunity Act of 2014 section 3(63) (A), 38 U.S.C 4215, and 20 CFR 1010 provides this guidance.

Covered persons obtain priority of service information through the WFWV website, flyers posted in AJC offices, banners, and in person from WFWV staff in work groups, unemployment compensation groups, during the registration process, and during the provision of services. WFWV provides staff with information, training, and assistance regarding available employment programs, training opportunities, services, eligibility requirements, and veterans' priority of service.

WFWV provides priority of service to covered persons under all state and federally funded employment and training programs. "Veterans priority of service" means that an otherwise covered person shall be given priority over non-veterans for the receipt of employment, training, and placement services provided under that program, notwithstanding any other provision of the law. When services are limited due to available funding, priority of service should be applied. For example, if there are only sufficient funds to provide services to one individual and a veteran is in the pool, the veteran must receive priority.

To effectively and efficiently facilitate the provision of services to covered persons, the Disabled Veterans' Outreach Program Specialists (DVOPS) provide coverage to each AJC location.

The WFWV job seeker enrollment process is utilized to identify and determine veterans' eligibility. All WFWV staff, including managers, are trained on the implementation of priority of service and on how to integrate it into the service delivery process. Eligibility for priority of service is identified in WFWV's MACC database by symbols that indicate that a covered person has been verified by staff or the covered person has self-attested concerning eligibility status. These symbols serve to easily identify individuals that may be eligible for priority of service. Contact information and office locations are readily available on the WFWV website. Covered

persons seeking employment can receive information about programs, priority of service, and eligibility at any time during the assessment process, on the WFWV website, banners, or posted on message boards in the AJC locations.

Priority of service is monitored by conducting regional manager/field supervisor audits as directed by WFWV leadership. The audits review job orders, services to veterans, and notification of job orders to covered persons prior to release to the public. This ensures that WFWV management receives information and that they are made aware of the operations and actions taken to provide priority of service to covered persons as mandated by law. West Virginia's Director of Veterans' Employment and Training (DVET) works with the State Veterans Coordinator to ensure that priority of service is administered in accordance with the law. Additional oversight of the provision of priority of service is provided by the US Department of Labor's (DOL) Employment and Training Administration.

Wagner-Peyser staff are a covered person's first point of contact in the AJCs. At this point, covered persons are assessed and entered into the service delivery system where they receive priority of service and those that have a Significant Barrier to Employment (SBE) and are in need of Individualized Career Services are referred to DVOPS staff.

DVOPS staff continue the assessment process to determine the covered person's employment options, assist with the Veterans Development Plan, and provide information to the covered person about a wide range of resources available.

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

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

Section 188 of WIOA ensures nondiscrimination and equal opportunity for various categories of persons, including persons with disabilities, who apply for and participate in programs and activities operated by recipients of WIOA Title I financial assistance. WFWV will use the "Promising Practices in Achieving Universal Access and Equal Opportunity: A Section 188 Disability Reference Guide" as a boilerplate in assuring compliance with Section 188 of WIOA. The Guide is designed to ensure meaningful participation of people with disabilities in programs and activities operated by recipients of financial assistance under WIOA, including those that are part of the AJCWV.

The Guide outlines promising practices in the provision of universal access and equal opportunity to programs and activities under WIOA. WFWV will use the guide in coordination with the Governor's WIOA Non-Discrimination Plan to monitor its own compliance, and that of its recipients, regarding the aspects of Section 188 and its implementing regulations that pertain to persons with disabilities.

The West Virginia workforce development system (WDS) is committed to ensuring physical and programmatic accessibility at its locations, including those at one-stop centers (AJCs). Policies

and procedures have been developed at the state and local levels to certify one-stop locations, based in part on an assessment of accessibility.

At the state level, WFWV has developed WIOA Policy 05-16 to address accessibility and reasonable accommodations. WIOA stresses physical and programmatic accessibility, including the use of accessible technology to increase access to high quality workforce services to individuals with disabilities. Title I of WIOA assigns responsibilities at the local, State, and Federal levels to ensure the creation and maintenance of an American Job Center (AJC) system that enhances the range and quality of workforce development services that are accessible to individuals seeking assistance.

To afford individuals with disabilities an equal opportunity to participate in and enjoy the benefits of the WIOA Title I program or activity, a recipient must furnish appropriate auxiliary aids or services where necessary. In determining what type of auxiliary aid or service is appropriate and necessary, recipients must give primary consideration to the requests of the individual with a disability. Primary consideration means honoring the choice unless the agency can demonstrate that another equally effective means of communication is available, or that using the means chosen would result in a fundamental alteration in the service, program, activity, or undue financial and administrative burdens. There are many forms of reasonable accommodations and the individual with a disability and the AJC should work together to identify the most effective reasonable accommodation for each individual through informal discussions known as the “interactive process” whereby the individual is provided the opportunity to articulate their needs and the AJC is able to determine how best to meet those needs.

To provide guidance to Local Boards, Chief Elected Officials, and one-stop system partners concerning the criteria to be used to evaluate and certify one-stop centers, WFWV developed WIOA Policy 05-17. This establishes what the State Workforce Development Board (WDB) considers the baseline, or minimum, requirements for AJC certification. Among numerous other requirements are the requirements regarding programmatic and physical accessibility, such as providing reasonable accommodations and completing regular accessibility reviews.

At the local level, local workforce development boards (LWDBs) have policies and procedures to ensure accessibility and certify one-stop locations. For example, Region 4 WIOA Policy: #23 - Accessibility and Accommodation, establishes that programs, services (including services using technology and the Internet), and facilities of the AJCs in the LWDB region are accessible to all.

The Region 4 Equal Opportunity (EO) officer conducts ADA assessments annually for all offices of WFWV in Region 4. In addition, an inclusion team has been created as a subset of the One Stop Managers and is charged with making sure the AJCs are accessible and can accommodate all customers regardless of disability or limitations. The inclusion team will conduct “secret shopper” walk-throughs by individuals with various barriers, at least annually to help determine areas that need improvement and highlight the areas that are working well. Technology will be used to provide access to documents in an accessible manner to customers who may need them in a larger format, different language, etc. The lobby of the AJC is laid out to be friendly to persons with various barriers; staff can access an office to accommodate persons as necessary. AJC staff will be provided with training at least annually to assist them in understanding how best to provide services to customers with various barriers to employment/training (for example: Welcoming Customers with Disabilities from the ADA website.) All WIOA staff at the AJC have completed this training, and it has been recommended to partner staff. The inclusion team meets monthly to discuss issues and determine how to meet any needs to be addressed,

using partner resources, technology and other appropriate means. Additional sources of training include the Job Accommodation Network and the Civil Rights Center.

Region 4 AJC operators and partners will comply with Section 188 of WIOA through staff training, facility checklists, monitoring of processes, and accessible technology for customers/employers. All partners sign an MOU that includes compliance with Section 188 of WIOA and 20 CFR 38. The EO officer will conduct ADA accessibility reviews for each WFWV site in the region at least annually. Staff training will be documented by each partner, with suggestions for training coming from front line staff, the EO officer for the region and areas of concern to the One Stop Management Team. Region 4 does not have a culturally diverse population so materials in a language other than English will be provided upon request as needed by the employer/job seeker. Federal, State, and local policy will be followed to provide accessibility and accommodation for everyone seeking services in Region 4.

As the vocational rehabilitation core partner agency, the Division of Rehabilitation Services (DRS) is readily available to provide disability-related technical assistance, provide one-stop staff training, and other related assistance in AJCs across the state. DRS' Rehabilitation Technology Unit is also available statewide to provide detailed ADA assessments, recommendations for rehabilitation technology, and engineering plans/drawings. DRS also provides training and technical assistance relating to assistive technology, including various hardware and software options. The DRS Information Technology Unit is available to provide assessments and technical assistance relating to websites, electronic documents, etc. to ensure accessibility and Section 508 compliance. An example of these services can be found in Region 5, where DRS staff regularly meet with AJC staff to identify opportunities for improvements at regional AJCs, conduct cross-training, provide technology assistance for AJCs, and coordinate programs and services to better address the diverse needs of job seekers with disabilities. As a result, staff are better able to identify advanced opportunities for individuals with disabilities, as well as the possibility for co-enrollment in other programs.

The State will coordinate with AJCWV partners to meet the needs of the non-English speaking customers. WFWV Guidance Notice 2-17, "Communication with Persons with Limited English Proficiency (LEP)" details some methods that will be used, such as having vital documents translated into Spanish (and other languages, as needed) and providing interpreters when requested.

IV. COORDINATION WITH STATE PLAN PROGRAMS

The Interagency Collaborative Team (ICT) was established under the state Workforce Investment Act to ensure coordination between the agencies engaged in workforce development activities, the LWDBs and WorkForce West Virginia.

The ICT continues to operate as a state interagency source for addressing issues or concerns related to building and maintaining the most effective and efficient implementation of WIOA and the overall workforce development system in West Virginia. The team's focus is on how best to collaborate between and among the state agencies directly involved in workforce development activities. The ICT serves as a forum for the LWDBs to seek information or recommendations to fulfill their responsibilities. WFWV convenes the team at least monthly and provides administrative and other services.

V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

The Unified or Combined State Plan must include assurances that:

The State Plan must include	Include
1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;	Yes
2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;	Yes
3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;	Yes
4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or 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
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

The State Plan must include	Include
11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and	Yes
12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.	Yes

VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

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

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

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

A. GENERAL REQUIREMENTS

1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

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

Local Regions:

The State of West Virginia is divided into seven local workforce development areas. While the attached map shows the geographic breakdown of the seven areas/regions, a brief description of each follows:

Region 4: Nine counties are served by the Workforce Development Board Mid-Ohio Valley, which is located in Parkersburg.

Region 5: The Northern Panhandle Workforce Development Board provides services in six counties and is based in Wheeling.

Region 6: The Region 6 Workforce Development Board, located in Fairmont, provides services in a thirteen-county region in the north-central portion of the State.

Region 7: Eight counties in the easternmost portion of West Virginia are served by the Region 7 Workforce Development Board located in Moorefield.

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

The state issued the following Guidance Notice regarding Designation/Re-Designation

WIOA Guidance Notice No. 01-15 Designation/Re-Designation

TO: Workforce Development Boards

FROM: WorkForce WV West Virginia

CATEGORY: WorkForce Innovation and Opportunity Act

SUBJECT: Designation/Re-Designation of Workforce Development Areas and the Appeals Process

SOURCE: Federal/State

DISTRIBUTION: Managers, Workforce Development Programs Staff, Workforce Region Directors and Staff

EFFECTIVE DATE: July 1, 2015

REFERENCE(S):

Title I of the Workforce Innovation and Opportunity Act (WIOA) of 2014, WIOA Section 106.

PURPOSE:

To provide guidance and process for the designation and re-designation of Workforce Development Areas in West Virginia along with the process for appealing designation decisions.

BACKGROUND:

The Workforce Innovation and Opportunity Act (WIOA) mandates that the West Virginia Workforce Development Board (SWDB) shall assist the Governor in designation of Workforce Areas, as required in section 106, and that an appeals process is in place.

The Governor of the State shall designate local workforce development areas within the State:

(i) Through consultation with the State board; and (ii) After consultation with chief elected officials and after consideration of comments received through the public comment process as described in section 102(b)(2)(E)(iii)(II).

WIOA further states that the considerations should include the following:

(i) The extent to which the areas are consistent with the labor market areas in the State; (ii) The extent to which the areas are consistent with regional economic development areas in the State; and (iii) The extent to which the areas have available the Federal and non-Federal resources necessary to effectively administer activities under subtitle B and other applicable provisions of this Act, including whether the areas have the appropriate education and training providers, such as institutions of higher education and area career and technical education schools. WIOA states that a unit of general local government (including a combination of such units) or grant recipient that requests, but is not granted designation of an area as a local area, may submit an appeal to the State board under an appeal process established in the State plan.

DEFINITIONS:

PERFORMED SUCCESSFULLY-The term “performed successfully”, used with respect to a local area, means the local area met or exceeded the adjusted levels of performance for primary indicators of performance described in section 116(b)(2)(A) (or, if applicable, core indicators of performance described in section 136(b)(2)(A) of the Workforce Investment Act of 1998, or the Common Measures, as allowed by a USDOL approved waiver of the core indicators of performance, as in effect the day before the date of enactment of this Act) for each of the last 2 consecutive years for which data are available preceding the determination of performance under this paragraph.

SUSTAINED FISCAL INTEGRITY-The term “sustained fiscal integrity”, used with respect to a local, means that the Secretary, or the State in place of the Secretary, has not made a formal determination, during either of the last 2 consecutive years preceding the determination regarding such integrity, that either the grant recipient or the administrative entity of the area misexpended funds provided under subtitle B (or, if applicable, title I of the workforce investment Act of 1998 as in effect prior to the effective date of such subtitle B) due to willful disregard of the requirements of the provision involved, gross negligence, or failure to comply with accepted standards of administration.

BUSINESS LEADER-A business member of the Local Workforce Development Board or representative of other business organizations, such as a chamber of commerce.

COMMUNITY LEADER-An officer or director of an association, community, or civic organization whose focus or activities are related to the services provided by the one— stop delivery system.

DESIGNATION AND REDESIGNATION POLICY:

WIOA requires that existing federally recognized workforce areas are designated during the first two program years, which is referred to as Initial Designation, and again after the first two program years, which is referred to as Subsequent Designation. Units of general local government that desire to become a new local workforce area should follow the New Area designation requirements in section B.

INITIAL WIOA DESIGNATION FOR EXISTING REGIONS: Existing workforce regions operating in accordance with the Workforce Investment Act of 1998 may request initial designation as a Local Workforce Development Area if they have performed successfully.

WIOA DESIGNATION FOR NEW AREAS: Any unit of general local government may request designation as a Local Workforce Development Area under WIOA. New local area designations will only become effective on July 1 of the next program year. In order for designation to be approved for the start of the next program year, the following steps and timeline must be met.

1. A statement of intent to request designation must be submitted to the West Virginia SWDB no later than February 15th through email. The SWDB will work with the requesting area to determine the deadline for the full request. Submitted materials will be made available for public comment as a part of the review process. The full request for designation as Local Workforce Development Area (“local area”) must include the following components and steps: Submit the request in writing to the Chairperson of the West Virginia Workforce Development Board through email to swdb@wv.gov and swdb@wv.gov. Receipt of the request must be documented by electronic return confirmation. If the requestor does not receive confirmation, it is their responsibility to contact WorkForce West Virginia to ensure that the notice has been received.
2. This request must clearly state the circumstances for the request of designation.
3. The request must also address and explain how the following criteria are met:
 - a. Consistency with natural labor market areas.
 - b. Consistency with regional economic development areas
 - c. Existence of education and training providers, such as institutions of higher education and career and technical education schools in the area.
 - d. Submission of a service delivery plan that includes a description of resources that would be available to the area to provide services.
 - e. Coordination of multiple resources within areas that are based on labor markets and natural travel patterns of local residents.
 - f. Local support of the implementation strategies to provide quality services to employers and individuals by county commissioners, municipal elected officials including mayors and/or city council members where appropriate, and business or community leaders within the area as demonstrated by letters of support or a vote of support by a city council or other applicable board.
 - g. Local ownership exhibited by strong involvement of local elected officials and community leaders on the Local Workforce Development Board.
 - h. Local capacity to manage funds, provide oversight of programs, and provide for the proper stewardship of public funds
 - i. 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 and was not subject to the sanctions process resulting from missing the same measure two years in a row, if applicable.
 - j. Assurance 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
 - k. grant recipient or administrative entity for the local area has misexpended funds due to willful disregard, gross negligence, or failure to comply with accepted standards of administration, if applicable.

4. The request must address how the proposed new area designation will impact those other workforce areas from which it is withdrawing. It should be understood by any unit of general local government or a combination of such seeking designation, that the new area will only secure the formula allocated funds for each WIOA funding stream based on the formula factors as defined by WIOA. If the area in question becomes part of a consortium, the consortium will determine the distribution of WIOA funds with its region(s).
5. If opposition to the request is voiced by municipalities or counties within the area seeking designation, then the requesting entity will address their request at a public hearing. The requesting entity will have the opportunity to respond to the concerns and questions at the hearing, and all comments will be recorded and used to inform the SWDB's action on the request. If a hearing is necessary, it will be held within 45 days of receipt of the request. Time and place is to be determined by the SWDB Chair.
6. The Chair will take the request and comments from the public as well as from a public hearing, if applicable and make a recommendation to the full SWDB.
7. The SWDB will submit its recommendation to the Governors within five (5) business days of the State board vote.
8. The final decision rests with the Governor and shall be made prior to May 29th, four weeks prior to the beginning of the fiscal and program year (July 1st).

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 West Virginia Workforce Development Board.

1. An appeal must be in writing and filed with the West Virginia Workforce Development Board within fourteen (14) days after notification of the decision. Submit the appeal to the Chairperson of the West Virginia Workforce Development Board by sending an email to and .
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 under section V. A. or section V. B. of this policy, 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 Administrators U.S. Department of Labor The Curtis Center, Suite 825 East 170 South Independence Mall West Philadelphia PA 19106-3315. In addition, a copy

must be sent to WorkForce West Virginia at 1900 Kanawha Boulevard East, Building 3, Suite 300, Charleston, WV 25305.

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

Definition: Where the term “days” appears, it shall be defined as calendar days, not working days.

IMPLEMENTATION DATE: Immediately upon receipt.

INQUIRIES: Please direct all inquiries to: WorkForce West Virginia

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

**Addressed in preceding question

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

Upon receipt of the specific terms of a SFM, any Local WDB or one-stop required partner may appeal for cause, within 21 calendar days, in writing (electronic or hardcopy), WFWV's (with the Governor's approval) determination regarding the portion of funds (or non-cash contributions) it is to provide. To be officially received, an appeal must fully contain and evidence the following:

- Addressed to the attention of the Deputy Executive Director of Federal Programs or his/her designee.
- An introduction identifying the appellant and designating the letter as a formal appeal.
- Full citations from WIOA or the WIOA Final Rules in Title 29 or Title 34 of the Code of Federal Regulations (CFR) that support the appeal.
- Identify the basis for the appeal. *WIOA stipulates that a State Funding Mechanism (SFM) allocation determination may be appealed only if the determination is inconsistent with the requirements of WIOA sec. 121(h)(2)(E). The Final Rule at 20 CFR 678.750 further limits admissible grounds for an appeal to three possibilities. The petitioner must make a case that the State's determination is inconsistent with:*
 1. the proportionate-share requirements in 20 CFR 678.737, or
 2. the cost-contribution limitations in 20 CFR 678.730(c), or
 3. the cost-contribution caps in 20 CFR 678.738
- The letter must be signed (electronic signature is acceptable) and dated.

WFWV will have 10 days to acknowledge the appeal. WFWV then has 30 business days to convene and hear testimony from all parties involved. After hearing testimony, WFWV, under the designated authority and approval of the Governor, has an additional 30 business days to issue a formal resolution for the issue. Until the appeals process is completed, the appellant will remain liable for its contribution as originally determined in the SFM. If a one-stop partner's appeal to WFWV using the process described in 20 CFR 678.750 is successful and results in a change to the one-stop partner's infrastructure-cost contributions, then the Local Area's MOU *must* be updated to reflect the final one-stop partner infrastructure cost contributions.

WIOA Policy No. 06-17 - Memorandum of Understanding/Infrastructure Guidance, Change 1 can be found at: <https://workforcewv.org/public-information/guidance-notices-and-policies> or directly at: https://workforcewv.org/images/files/PublicInfo/public-notices/Policy_No_6-17_MOU_and_Infrastructure_Guidance_Change_1.pdf. Appeals Process can be found on page 8.

2. STATEWIDE ACTIVITIES

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

State policies or guidance for the statewide WDS can be found at: <https://workforcewv.org/public-information/guidance-notices-and-policies>

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

The LWDBs have the option of requesting additional funding other than their formula distribution, to ensure that dislocated workers remain a priority for the WDS. This allows LWDBs to create partnerships with employers for On-the-Job Training Programs, Transitional Jobs, and ITAs. When the LWDB exhausts or becomes low on formula funds or collaborates with businesses and partners to produce a comprehensive program, they may request additional funds. Awards are made based on the amount of funds requested and the proposal documentation submitted. West Virginia supports innovation by reviewing the results of current and recent projects to identify those that show positive results and could benefit from additional resources.

Programs awarded from the state set aside fund include the following examples:

- In Region 1, the Transitional Jobs program targets individuals in recovery, most of whom are in residential recovery homes. Transitional Jobs offer participants the opportunity to learn the routine of work, acquire work-task skills, establish an employment record, and generate references for future employment. Transitional Jobs provide the participants with case management, wages, and comprehensive career and support services with the goal of transitioning to full-time employment.
- The Empowered Employment Pilot Program is designed to assist individuals in obtaining a time-limited work experience that is wage-paid, subsidized up to 100%, and is in the public, private, or not-profit sectors.
- The “Re-Building One’s Opportunities Together” (REBOOT) program, developed by region 5, provides re-employment activities to those participants, who are, or have been, impacted by the Opioid Crisis. The program is designed to create employment and/or training opportunities that help target secure sustainable jobs and/or needed training as participants work to turn their lives around and become contributing members of their communities.

West Virginia uses WIOA funds to support a state Rapid Response unit, called the State Dislocated Worker Services (DWS) Unit. The unit conducts rapid response activities to dislocated workers through employer outreach which is coordinated as a joint rapid response

team approach between the State Dislocated Worker Services Unit and the LWDB. The Trade Act unit is also part of the State Dislocated Worker Services section to provide information on the Trade Adjustment Assistance (TAA) program. When a rapid response meeting is conducted, research begins with the TAA state office and the Peer Support Labor Liaison office to determine if a company meets the eligibility criteria for TAA and a petition can be filed. If a petition is filed and certified prior to a rapid response meeting, a coordinated meeting is conducted emphasizing all the benefits and services provided through WFWV and partner agencies.

Each rapid response meeting includes representatives from the AJC explaining services and benefits to assist dislocated workers, including, but not limited to unemployment, job service, career planners for training eligibility purposes, DRS, DHHR, and LWDBs. For dislocations, all WFWV processes are discussed. After the meeting is conducted, the individual is registered in the MACC and a questionnaire is completed highlighting the individual's employment/training objectives and goals. These questionnaires assist in serving the individual in a timely and more effective manner by following the career pathway of their choosing and involving partner agencies in achieving these objectives and goals.

Businesses who will be experiencing layoffs or closure come to WFWV through various communication methods: AJC staff, Worker Adjustment and Retraining Notices (WARNs), news outlets, employees, and unemployment reports showing noticeable claims, which are then investigated by the Rapid Response coordinator.

Additional services are organized at Rapid Response meetings such as special sessions with unemployment to answer more in-depth questions, resume writing, and interviewing skills workshops either on-site or at an AJC. Sometimes these workshops are incorporated into the Rapid Response meeting. WFWV's integrated system provided employment, partner, and resource information to Constellium Rolled Products and Homer Laughlin China Company in 2020 and to Mylan Pharmaceuticals in 2021 for workers receiving rapid response information packets. The dissemination of information included questionnaires to assist in identifying individual goals and objectives and to provide job search and training activities for dislocated workers. Ongoing communication with workers conducted by the rapid response team was conducted through emails, telephone calls, and follow up letters.

Rapid Response provides a comprehensive array of services to offer transitional assistance in the form of community resource lists and contact information and reemployment services available through the AJCWVs, such as job search and training opportunities as well as unemployment services to accelerate the reemployment process. Other Rapid Response activities include community resource fairs, job fairs, training provider fairs, etc. that may be conducted in conjunction with Rapid Response Informational Meetings or separately. While most of the effort is usually expended in the early stages of a dislocation event or an impending dislocation, it is important to continue Rapid Response services until all worker and employer needs are met.

The State coordinates layoff aversion strategies through the direct and immediate efforts of the Governor's Office in connection with the West Virginia Development Office's Business and Industrial Development representatives, who mobilize concentrated efforts to salvage at-risk companies or entities through incumbent worker training through the Governor's Guaranteed Workforce Program, etc. When companies advise the State that they are experiencing difficulties, there is timely sharing of all pertinent information of at-risk companies between the State Dislocated Worker Services Unit and the Business and Industry Development representatives so the layoff aversion strategies can be quickly implemented. In the event the strategies have not

been shared at all local and State levels, because of the sensitivity and confidentiality of some of the processes involved in averting a layoff, the State Dislocated Worker Services Unit communicates directly with the Secretary of the West Virginia Department of Commerce with a notification of a need for the provision of Rapid Response services. This occurs often for dislocations in the state and usually results in receiving clearance to proceed with Rapid Response services.

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

WorkForce West Virginia has specific procedures in place to provide Rapid Response services in case of a Natural Disaster as stated in Part 687 of the WIOA Public Law. The State immediately applied for a National Dislocated Worker Grant (NDWG) for a disaster temporary work program for disaster clean-up activities which would be coordinated with FEMA and State Homeland Security and the Office of Emergency Services. In addition to applying for NDWG, dislocated workers experiencing displacement due to a natural disaster, such as flooding, would be covered under the State's Rapid Response coordination of services and would be a call to address more than just a quick return to work. Therefore, a State Rapid Response Team in conjunction with local Rapid Response Team members and partners could be deployed to the disaster site to conduct Rapid Response Informational Meetings and related Rapid Response activities, if necessary.

Rapid Response would coordinate with FEMA, SBA, and other relief organizations to make sure the affected workers have a full array of resources to assist them in recovering from a natural disaster. If a natural disaster occurred followed by a FEMA disaster declaration, the availability of the temporary work program would also be highlighted at Rapid Response meetings. If the magnitude of the disaster resulted in mass layoffs/plant closures, and there was not enough WIOA formula funding or Governor's Discretionary funding available at the state level, then the State would apply accordingly for a mass layoff NDWG. If the disaster led to a sizeable mass layoff NDWG being awarded to the State, the Governor's Office would take the lead in implementing a state emergency plan mobilizing a host of state and federal resources to, which include close coordination of the mass layoff NDWG with the efforts of FEMA and State Homeland Security and Office of Emergency Services as well as other State agencies.

Partner Services as part of our response team may be comprised of Wagner-Peyser, DHHR, DRS, LWDBs, Healthcare navigators for those who have lost their insurance due to loss of job, SBA, a FEMA Partner, FEMA representative, Veteran Representative, and Union representatives to assist those represented by a union.

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

Rapid Response operates in the same manner regardless of whether a TAA petition is involved and provides timely information to dislocated workers with the goal of returning workers back to the labor market in sustainable employment.

West Virginia's early intervention to worker groups, on whose behalf a TAA petition has been filed, is in conjunction with our WIOA Rapid Response activities. In most cases, by the time a TAA petition is filed, WIOA rapid response activities have already taken place and basic and individual services are being provided.

After a TAA petition has been filed by the State TAA Unit, additional information specific to TAA is explained, through a TAA/TRA Benefit Rights Informational Meeting (BRIM) to thoroughly explain the TAA program. Since the impacted workers have already received critical information at a previous Rapid Response meeting, the BRIM Meeting focuses specifically on TAA benefits and services and required deadlines.

West Virginia continues to strive for improvements and increased coordination between the TAA and WIOA programs by mandating co-enrollment, providing necessary services and data sharing to create a seamless and effective process for dislocated workers. All TAA paperwork and documentation is imaged into the MACC and WIOA /TAA staff have access to all WIOA/TAA services to eliminate the duplication of services and to strengthen the ability to share accessible data benefiting the dislocated workers.

B. ADULT AND DISLOCATED WORKERS PROGRAM REQUIREMENTS

1. WORK-BASED TRAINING MODELS

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

Transitional Jobs, On-the-Job Training, and Incumbent Workers

West Virginia will increase training opportunities to individuals via alternative training models such as Transitional Jobs, On-the-Job training (OJT), and Incumbent Worker Training (IWT). The LWDBs are encouraged to leverage current and develop new local partnerships with community businesses and industry to support economic development in their areas. AJCs will provide access to training services aligned with in-demand occupations, which may include occupational skills training, OJT, IWT programs that combine workforce training with related instruction, skill upgrading and retraining, entrepreneurial training, transitional jobs training, job readiness training provided in combination with other training, Adult Education and Literacy activities, and customized training (customized training is designed to provide local areas with flexibility to ensure that training meets the unique needs of the job seekers and employers or groups of employers). The underlying advantage of work-based learning is that by definition, it incorporates skill competencies needed by the business. There is no doubt participants are learning the specific skills needed, and furthermore they are learning to apply skills in the way the employer prefers. These arrangements practically guarantee that individuals who complete training are positioned to immediately add value in the workplace and have marketable skills to provide upward mobility in a career pathway.

Transitional Jobs

Transitional jobs are reserved for those who are chronically unemployed and provide real life work experience when it is greatly needed to be successful in the workplace. Transitional jobs is an employment strategy that seeks to overcome employment barriers and transition people with labor market barriers into work using wage-paid, short-term employment that combines real work, skill development and supportive services. Transitional Jobs program participants earn a paycheck, learn skills, may become eligible for the Earned Income Tax Credit, and receive intensive mentoring and support.

The Transitional Jobs program should have at a minimum the following three components:

1. Paid work experience (i.e. three days per week)
2. Classroom training (i.e. soft skills, occupational skills, etc.)
3. Supportive services

Each LWDB must submit a Transitional Jobs Plan to WFWV for approval. Collaborative partnerships will be an essential piece of a transitional jobs plan and are highly encouraged. LWDBs may allocate up to 10 percent of local Adult and Dislocated Worker funds to transitional jobs for individuals with barriers to employment.

On-the-Job Training

OJT ensures high quality training for both the participant and the employer because both have a vested interest in the success of the program. The employer has the unique opportunity of training potential candidates in the correct and most efficient way to perform tasks for their company, at a subsidized cost. The participant has the opportunity to receive direct training and experience that increases their current skill set. Participants also gain new skills to meet the requirements of a new occupation or industry and are better equipped to compete for available jobs. All OJT experiences are provided through contracts between local employers and the LWDB. OJT is primarily designed to hire the participants and provide them with the knowledge and skills necessary for the full performance of the job. Both training providers and employers providing OJT opportunities must be providing the highest quality training to participants. OJT contracts must be continually monitored so that the WIOA funds allocated are providing participants the training to retain employment successfully. It is imperative that OJTs provide participants with the relevant skills and opportunities for career advancement and provides employers with a skilled workforce.

Incumbent Worker Training

West Virginia also supports Incumbent Worker Training. To qualify as an incumbent worker, the worker needs to be employed, meet the Fair Labor Standards Act requirements for an employer-employee relationship, and have an established employment history with the employer for six months or more. The training must satisfy the requirements in WIOA Section 134(d)(4) and §680.790 and increase the competitiveness of the employee and/or employer. An incumbent worker does not necessarily have to meet the eligibility requirements for career and training services for adults and dislocated workers under WIOA. LWDBs may reserve and are allowed to expend up to 20 percent of their combined adult and dislocated worker formula allotments for IWT. States may use state Rapid Response funds [WIOA Section 134(a)(3)(A)(i)] for layoff aversion and WIOA Governor's discretionary funds for statewide incumbent worker training activities.

LWDBs must consider the following factors when determining the eligibility of employers to receive the WIOA share of funds to provide training to incumbent workers using either local Adult and/or Dislocated Worker formula funds or WIOA statewide discretionary funds provided by the Governor:

1. The characteristics of the incumbent workers to be trained, specifically the extent to which they historically represent individuals with barriers to employment as defined in WIOA Section 3(24), and how they would benefit from retention or advancement;
2. The quality of the training (e.g., industry-recognized credentials, advancement opportunities);
3. The number of participants the employer plans to train or retrain;
4. The wage and benefit levels of participants (before and after training).
5. The employer must not have laid off workers within 12 months and must have a commitment to retain or avert the layoffs of the incumbent worker(s) being trained;
6. The employer must not be delinquent in unemployment insurance or workers' compensation taxes, penalties, and/or interest.
7. LWDBs must document these factors in approving an incumbent worker training project with an employer.

Employers participating in incumbent worker training are required to pay the non-WIOA (non-federal) share of the cost of providing training to their incumbent workers. Employers will be reimbursed the WIOA (federal) share. The employer share is based on the size of the workforce (wages paid to the participant while in training can be included as part of that share) as follows:

- At least 10 percent of the cost for employers with 50 or fewer employees.
- At least 25 percent of the cost for employers with 51 to 100 employees.
- At least 50 percent of the cost for employers with more than 100 employees.

Incumbent worker training is designed to either assist workers in obtaining the skills necessary to retain employment or to avert layoffs and must increase both a participant's and a company's competitiveness. The Incumbent Worker training policy allows local Boards the flexibility to provide Incumbent Worker Training to employers when needed. Local areas may use up to 20 percent of their local adult and dislocated worker funds for incumbent worker training. Incumbent worker training is targeted to improving the skills and competitiveness of the participant and increasing the competitiveness of the employer. The training should, wherever possible, allow the participant to gain industry-recognized training experience and ultimately should lead to an increase in wages. To receive incumbent worker funding under WIOA, an incumbent worker must have an employer-employee relationship, and an established employment history, with the employer. Incumbent workers are employed at the time of their participation, and the contract funds are paid to the employer for training provided to the incumbent worker either to avert a lay-off or otherwise retain employment. A "model" incumbent worker training would be one where a participant acquires new skills allowing him or her to move into a higher skilled and higher paid job within the company, thus permitting the company to hire a job seeker to backfill the incumbent worker's pre-training position.

Work-based training can be an effective training strategy that can provide additional opportunities for participants and employers in both finding high quality work and in

developing a highly skilled workforce. Each of these work-based models can be effectively used to meet a variety of job seeker and employer needs. To ensure high quality training for both the participant and the employer, priority consideration will be given to training programs that are related to an in-demand occupation, aligned with career pathways and industry sectors and result in a recognized postsecondary credential. LWDBs must not continue to contract with employers who fail to provide participants with long-term employment opportunities, with wages and benefits, and working conditions comparable to other employees who have worked a similar amount of time, doing the same type of work. LWDBs will monitor employer onsite contracts to ensure training, wages, hours, benefits, and working conditions are provided in accordance with the contract. Training participants' performance and progress will be monitored during the training to determine supportive service needs, the appropriateness of the training activity and if placement in unsubsidized employment has occurred. WFWV will pursue the following strategies to ensure work-based training models are of high quality:

- Promote and develop sector strategies based on labor market information and employer needs.
- Connect employers to participate in business-education partnerships. These partnerships connect schools, employers, and community organizations with individuals to provide career-related experiences and employment opportunities such as soft skills development, internships, OJT, workplace shadowing, and career mentoring.
- Emphasize career pathways to assist individuals entering and moving within the labor force and to educate employers on the advantages of career pathways.
- Ensure career pathways are aligned to in-demand occupations likely to pay sustaining wages. The LWDBs will engage employers to accomplish this goal.
- Require OJT and IWT to be tied to a career pathway.

Policies governing Incumbent Worker Training are currently being updated. Once the revisions are complete, copies of these policies will be available on the WorkForce West Virginia website.

Current WIOA Policy 3-16 Transitional Jobs Policy and WIOA Policy 01-16 Incumbent Worker can be found at: <https://workforcewv.org/public-information/guidance-notice-and-policies> or directly at: https://workforcewv.org/images/files/PublicInfo/guidance-notice/WIOA_Policy_3-16_Transitional_Jobs_Policy.pdf and https://workforcewv.org/images/files/PublicInfo/guidance-notice/WIOA_Policy_No_01-16_Incumbent_Worker_Policy.pdf.

2. REGISTERED APPRENTICESHIP

Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., job center staff taking applications and conducting assessments).

The State will continue to incorporate Registered Apprenticeships into its strategies and services by requiring American Job Center (AJC) staff to seek out and assist Registered Apprenticeship Programs (RAPs) with recruitment into their individual training programs.

Recruitment will include posting and advertisement of Registered Apprenticeship statewide announcements, job orders, phone notifications of apprenticeship openings, veteran priority of service, pre-application testing, initial screening of eligibility requirements and referral. Referral

not only includes referral to the job order but to our partners for orientation and eligibility determination for WIOA funding for training. Additional strategies and services will include making space available to the apprenticeship programs for onsite job fairs for recruitment, advertising space for apprenticeship marketing items, space for onsite interviews and assistance, as needed, with testing applicants at offsite locations.

3. TRAINING PROVIDER ELIGIBILITY PROCEDURE

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

WFWV's Eligible Training Provider List (ETPL) consists of training programs that are approved by WFWV and LWDBs to provide training services to eligible WIOA Title 1-B participants. All training providers must submit information and criteria as established under WIOA §122(d) through (g). Training providers use the MACC to provide all required information for initial eligibility, which includes Assurances, as well as applications for each program of study. MACC doubles as WFWV's program certification system and the Statewide List of Eligible Training Providers, as required by WIOA §122 (a)(3). All approved programs are available to the public and to WIOA partners in the MACC. WFWV and the LWDBs share the responsibility of managing the ETPL, including approving programs for initial and continued eligibility, ensuring training provider compliance, and ensuring accuracy of information, removing training providers or programs, and monitoring training providers. Upon receipt of completed application and program data, WFWV shall attempt to make an initial determination of statewide eligibility within 15 business days. Training providers will be contacted via email if the completed application and/or program data requires clarification. The Local Workforce Development Board (LWDB) will then have 10 business days to review and make comments to the state prior to the official determination of eligibility and placement on the ETPL. Subsequent eligibility determinations take place on a biennial basis, where performance data is again evaluated based on the standards. Once the training provider is approved, each training program is evaluated to determine if training programs meet ETPL requirements, including initial performance data standards, resulting in a federally or locally recognized credential and being related to an in-demand sector or occupation in West Virginia. The State ETPL Coordinator reviews required ETPL program information on the application including the following: a detailed description of the program, the total cost of the program, including the cost of tuition, books, and any fees, credential information, and labor market information for the related occupation, including the minimum entry level wage and demand for the occupation in the local area, and initial performance data.

LWDBs are encouraged to target training programs that support industry sectors and prepare participants for jobs in identified career pathways. Using Labor Market Information (LMI), LWDBs are able to determine higher paying jobs, in-demand industry sectors, and occupations in the local area enabling them to work with local employers to determine the minimum requirements for these jobs and the types of training and certification requirements for these positions. Using this information, LWDBs are better equipped to reach out to local training providers to encourage them to add their training program to the ETPL.

The State ETPL Coordinator will review the training provider's program performance based on the performance accountability measures, using data on all WIOA Title I-B participants who participated in the training program during the performance period. Each program's

performance will be evaluated against state performance standards to determine if the program will remain on the list.

WIOA Policy 01-15 - ETPL Change 3 can be found at: <https://workforcewv.org/public-information/guidance-notice-and-policies> or directly at: https://workforcewv.org/images/files/PublicInfo/public-notice/WIOA_Policy_01-15_-_ETPL_Change_3.pdf.

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

WorkForce West Virginia (WFWV) implements priority of service for veterans in accordance with Title 38 part III Ch. 42. 4215 via the American Job Centers (AJCs) located throughout the state. To ensure access to services for covered persons, the state has established formal guidance regarding priority of service that all Wagner-Peyser and WFWV staff must follow, including determination of veteran status and eligibility. WIOA guidance notice 4-16 referencing the Workforce Innovation & Opportunity Act of 2014 section 3(63) (A), 38 U.S.C 4215, and 20 CFR 1010 provides this guidance.

In addition, West Virginia established Policy 2-16 addressing priority of service. Priority of service for individualized career services and training services funded with Title I Adult funds will be as follows:

- First Priority: Veterans and eligible spouses (covered persons) who are low-income or recipients of public assistance or who are basic skills deficient.
- Second Priority: Individuals (non-covered persons) who are low-income or recipients of public assistance or individuals who are basic skills deficient.
- Third Priority: Veterans and eligible spouses who are not low-income and are not recipients of public assistance or basic skills deficient.
- Fourth Priority: Individuals who do not meet the above priorities.

Each Local Workforce Development Board (LWDB) has the flexibility, when creating their own policies, to include a process that also gives priority to other individuals, as long as priority for those individuals comes after the first four groups described above. Priority of service does not mean that only those individuals who meet the criteria listed above will be served. It means that if there are individuals who meet those criteria who are registered for service and deemed in need of career and training services, they will be enrolled before other individuals are considered. Intake and career planning services inform decision making on who will be enrolled, essentially using the rule that if individuals who meet the priority of service definition are available, they will receive consideration for training services (i.e. Individual Training Accounts) and work-based experience programs (i.e. OJT) over others.

Individuals eligible for a priority of service are identified at the point of entry. Upon identification, they are notified of their entitlement to priority of service; the full array of programs and services available to them; and any applicable eligibility requirements for those programs and services. LWDB staff must ensure that individuals who qualify for priority of service receive individualized career and training services before other non-covered individuals

and receive first priority on any waiting lists that are maintained for training slots. However, once a participant is enrolled in a workshop, training, or service, he or she may not be displaced by an individual qualified for priority of service.

Each LWDB will document priority in the participant's file and in the State's Management Information System (MIS). West Virginia's MIS provides career planners with the appropriate data fields to record eligibility, such as veteran status, eligible spouse, low income, public assistance, basic skills deficient, and case notes. Career planners then either upload appropriate documents into the MIS or place them into the participant's file. On-site monitoring will determine if each LWDB is in compliance with Federal regulations, as well as all State and Local policies. WFWV staff will review the Participant Individual Record Layout and any other available federal report data elements and performance metrics to test for compliance with the priority of service rule, and ensure that priority of service is provided to veterans/eligible spouses, public assistance recipients, other low-income individuals, and individuals who are basic skills deficient.

WIOA Policy 2-16 Priority of Service Policy for Adult Title 1 Funding can be found at: <https://workforcewv.org/public-information/guidance-notices-and-policies> or directly at: https://workforcewv.org/images/files/PublicInfo/guidance-notices/WIOA_Policy_2-16_Priority_of_Service_Policy.pdf.

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

West Virginia recognizes that WIOA allows up to 100% of funds between programs with prior approval from the Governor. The state will ensure that any transfer of funds between WIOA programs complies with the WIOA law. LWDBs will also be required to record and document the use and application of local funds in accordance with instructions set forth in the grantee-subgrantee agreement. Workforce Innovation and Opportunity Act Policy 01-17

To: Local Workforce Development Boards (LWDBs), Chief Elected Officials, Regional Executive Directors

From: WorkForce West Virginia

Subject: TRANSFER OF FUNDS BETWEEN ADULT AND DISLOCATED WORKER LOCAL FORMULA FUNDS

Effective Date: January 18, 2017

WV State Workforce Development Board

Review Date: January 18, 2017

I. PURPOSE

The purpose of this policy is to provide the guidance and parameters for transferring up to 100 percent of a program year allocation for adult employment and training activities, and up to 100 percent of a program allocation for dislocated worker employment and training services between the two programs.

II. EFFECTIVE DATE BY WIOA

July 1, 2015

III. BACKGROUND

Section 133 (b)(4) of the Workforce Innovation and Opportunity Act (WIOA) allows the Local Workforce Development Board (LWDB) to transfer, if such a transfer is approved by the state, up to and including 100 percent of a program year allocation between the local adult and local dislocated worker programs. This transfer provides flexibility to the local workforce development area to provide services in the areas of greatest need.

IV. REQUIREMENTS

Funds should not be transferred from the dislocated worker program to the adult program without regard to demands for dislocated worker services. The state may question and, if sufficient justification is not provided by the area, may deny any application for rapid response funds to address a need if a transfer has occurred from the dislocated worker program to the adult program. A LWDB cannot transfer youth funds under WIOA.

Request for Transfer

For transfers of funds the LWDB must make a request to the state for approval of such transfer for a specific appropriation of adult or dislocated worker funding (i.e., program year or fiscal year of appropriation). The request must specify the type of funding (whether adult or dislocated worker) to be transferred to the other program.

There are short-term and long-term effects on program operations that could result from transfers of funds. The LWDB and the fiscal agent should examine the following considerations when deciding to transfer:

1. Are there adequate funds to maintain services to currently enrolled participants?
2. What is prompting the request?
3. How will you respond to unforeseen events?

All requests for transfer must include a written justification addressing each of the above-mentioned considerations and the reasons such transfer is necessary to provide adult or dislocated worker employment and training activities.

Requests are to be scanned to WorkForce West Virginia (WFWV) with "Fund Transfer Request" in the subject line. WFWV will respond to all requests. This transfer pertains only to a program (adult or dislocated worker) and program year or fiscal year of appropriation and will continue to apply for the life of the funds. The request must be signed by the Chief Elected Official, LWDB Chair and Local Executive Director. The State Deputy Executive Director of Field Operations and Deputy Executive Director of Fiscal Management will review, with the Executive Director of WFWV for approval.

Transfer of Funds

A LWDB should instruct the fiscal agent of the amount to transfer, up to 100 percent of local workforce development area formula allocations, based upon the state's approval, if the percentage being transferred required approval.

Funds will retain the year of appropriation identity (e.g., program year allocation) and must be reported and accounted for accordingly.

To transfer funds, the LWDB will use the transfer-related expenditure codes of the program from which funds are being transferred, in the state's financial system to report costs incurred by the program receiving funding.

The transfer limit of up to 100 percent, with approval from the state, shall apply to new allocations of adult and dislocated worker funding issued in the fiscal year beginning on or after July 1, 2015. This higher transfer limit does not apply to funds received in a prior fiscal year that may be carried into the new fiscal year. The level of transfer authority that existed at the time the funding was awarded shall continue to apply to those funds for their period of availability at the local level.

V. MONITORING

At the local level, the LWDB and/or the fiscal agent must conduct oversight of the transfer of WIOA adult and dislocated worker funds to ensure the transfer is being completed per this policy.

Through the state's monitoring system, fiscal monitors will review the area's transfer of adult and dislocated worker funds during the annual onsite monitoring review for compliance with federal and state laws and regulations. Any issues will be handled through the state's monitoring resolution process.

VI. TECHNICAL ASSISTANCE

For additional information, you may send your questions to WorkForce WV, WIOA Unit.

VII. REFERENCES

Workforce Innovation and Opportunity Act, § 133(b)(4), Public Law 113-128. NPRM § 683.130 found at 80 Fed. Reg. 20877 (April 16, 2015) (to be codified at 20 C.F.R. § 683.130). O.A.C. 5101:9-31-02, Workforce Investment Act (WIA) formulary allocation methodology. (July 24, 2014).

C. WITH RESPECT TO YOUTH WORKFORCE INVESTMENT ACTIVITIES AUTHORIZED IN SECTION 129 OF WIOA—

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]

[11] Sec. 102(b)(2)(D)(i)(V)

The LWDBs follow the State's procurement policies when awarding grants for workforce development system (WDS) activities. The following clause is included in a Workforce Grant Agreement:

Sub-granting:

The Grantee shall not enter into a sub-grant agreement for any of the work performed under this grant agreement without obtaining the prior written approval of Workforce West Virginia (WFWV). If sub-grant agreements are approved, they shall contain, at a minimum, sections of this grant agreement pertaining to indemnity, conflicts of interest, lobbying, nondiscrimination, audit requirements, public notice and any other state and/or federal requirements. Sub-grantee program performance accountability measures are assessed by program staff.

Examples of how local boards will take into consideration the ability of the providers to meet performance accountability are listed below-

- Utilize a RFP Request for Proposal (RFP) process for youth services. When the rating committee reviews the RFP, performance is one of the key factors in scoring.
- RFPs specifically address USDOL required performance measures as a requirement for any proposals that are submitted and/or accepted.
- Reference checks are completed on all proposals received, including USDOL performance in other contracts operated by the proposing organization
- During the course of the year, if a performance measure is not met, the contractor will be part of any corrective action plans developed.
- Setting real time outcome goals for proposers to meet. Meeting the real time outcome goals would be financially tied to contract renewal for the option year(s). Real time outcome goals could be:
 - Providers will be required to hold two recruitment events targeting Out-of-School youth (OSY) during the program year.
 - Providers should enroll a minimum of 80% of their youth (80% Out-of-School and 80% In- School) in a work experience activity during the program year.
 - Providers will be in contact with every active youth during the program year at a minimum of 2 times a month, with one contact being in person. The other contact may be by phone or social media. The contacts will be documented in the youth files and in the MACC as case notes for verification at scheduled file review visits by LWDB staff.
- The criteria for an award(s) of funding is based on: past performance, cost effectiveness, demonstrated overall program effectiveness, youth group(s) targeted for services, placement and retention efforts in offered education or employment programs, ability of the subcontractor(s) to meet and/or exceed performance goals and ability to meet administrative and fiscal grant responsibilities, to name a few.
- Subcontractor(s) are made aware of performance measures for the region and the importance of meeting/exceeding them via a contractual agreement. Specific language about meeting and/or exceeding performance measures is included in contractual agreements signed with subcontractor(s). Performance-based contracts are used for all subcontractor(s). Identified performance measures serve as benchmarks in the contractual agreement and are used for measuring progress.
- Subcontractor(s) are monitored no less than five (5) times per program year to review and evaluate the delivery of program curriculum, program performance, etc. and address any issues that arise. A corrective action plan, along with technical assistance, is provided to the subcontractor(s) should program performance not be met.
- Programs for in-school and out-of-school youth will focus on measurable skill gains.

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.

West Virginia will adhere to WIOA regulations regarding youth;

- Identify models and effective practices for youth, including recruitment and flexible enrollment, to help local area staff successfully meet the needs of those individuals.
- Partner with the U.S. Departments of Labor and Education and with LWDBs to ensure statistical models and negotiated performance levels are established and calibrated to accurately reflect the profiles of youth being served within the State and in each local area. Continue serving youth as a priority within the WDS;
- Develop transitional jobs, social enterprises, and other work experience strategies to help out-of-school youth (OSY) with limited work histories to develop the skills needed for workplace success.
- Co-enroll high-risk individuals, ages 18 to 24, as both WIOA Adult and WIOA Youth participants to leverage funds and provide necessary services. Co-enrollment can occur in Title II adult basic education services, EARN, TANF, or other partner programs. Continue the use of Individual Training Accounts (ITAs) for 18 to 24-year olds in combination with work-based learning opportunities.
- The State will expand opportunities for youth to acquire post-secondary skills and credentials needed for high wage jobs through increased access to career and technical education programs and work-based learning experiences. The Department of Education (WVDE) and the Community Technical College System (CTCS) will work cooperatively to explore and develop appropriate connections between WIOA Youth activities and Strengthening Career and Technical Education Act for the 21st Century (Perkins V) and state-funded programming.
- The WVDE will support the transformation and modernization of career and technical education (CTE) and align CTE with the career pathways recognized by the State.
- LWDBs will collaborate with YouthBuild, JobCorps, and AmeriCorps sites, identifying partnerships in local plans. Collaborate with LWDBs to identify access points which enable individuals to complete training and enter a successful career pathway.
- The West Virginia Division of Rehabilitation Services (DRS) has made concerted efforts, in conjunction with the State's Client Assistance Program (Disability Rights of West Virginia), to provide outreach and services to non-traditional settings for youth with disabilities, such as juvenile centers and facilities, Youth Reporting Centers, and other similar locations. The youth in these settings are afforded the same opportunity to receive Vocational Rehabilitation (VR) services, as well as information (e.g., career information and labor market information, as found on the Pathways to the Future website) and referrals, as youth in traditional settings, as appropriate. Community leaders in Charleston have also utilized DRS resources, such as materials from the Pathways website to impact the lives of "disconnected youth."
- Utilize the Office of Apprenticeship to promote apprenticeship and pre-apprenticeship opportunities for youth.

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]

[12] Sec. 102(b)(2)(D)(i)(I)

The State will contract with each of the LWDBs to ensure that each of the 14 program elements are administered in their local area.

State monitors will utilize the MACC to determine the availability and provision of the 14 program elements prior to the annual on-site reviews. Supporting evidence will be obtained to ensure that each LWDB has complied with the requirements of WIOA section 129 (c) (2).

Each LWDB will be notified of any deficiency and a corrective action plan will be required. The 14 program elements, listed below, will be added to the statement of work that is included in the grant agreement LWDBs are required to sign.

PROGRAM ELEMENTS - In order to support the attainment of a secondary school diploma or its recognized equivalent, entry into postsecondary education, and career readiness for participants, programs shall provide elements consisting of:

1. Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential;
2. Alternative secondary school services, or dropout recovery services, as appropriate;
3. Paid and unpaid work experiences that have as a component academic and occupational education, which may include:
 - summer employment opportunities and other employment opportunities available throughout the school year;
 - pre-apprenticeship programs;
 - internships and job shadowing; and
 - on-the-job training opportunities
4. Occupational skill training, which shall include priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area involved, if the local board determines that the programs meet the quality criteria described in section 123;
5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
6. Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate;
7. Supportive services;
8. Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;

9. Follow-up services for not less than 12 months after the completion of participation, as appropriate;
 10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate;
 11. Financial literacy education;
 12. Entrepreneurial skills training;
 13. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and
 14. Activities that help youth prepare for and transition to postsecondary education and training.
4. PROVIDE THE LANGUAGE CONTAINED IN THE STATE POLICY FOR “REQUIRING ADDITIONAL ASSISTANCE TO ENTER OR COMPLETE AN EDUCATIONAL PROGRAM, OR TO SECURE AND HOLD EMPLOYMENT” CRITERION FOR OUT-OF-SCHOOL YOUTH SPECIFIED IN WIOA SECTION 129(A)(1)(B)(III)(VIII) AND FOR “REQUIRING ADDITIONAL ASSISTANCE TO COMPLETE AN EDUCATION PROGRAM, OR TO SECURE AND HOLD EMPLOYMENT” CRITERION FOR IN-SCHOOL YOUTH SPECIFIED IN WIOA SECTION 129(A)(1)(C)(IV)(VII). IF THE STATE DOES NOT HAVE A POLICY, DESCRIBE HOW THE STATE WILL ENSURE THAT LOCAL AREAS WILL HAVE A POLICY FOR THESE CRITERIA.

An individual must meet the following criteria in order to be identified as a youth who needs additional assistance:

1. Must be between the ages of 14 and 24, and
2. Require additional assistance to complete an educational program or secure and hold employment, and
3. Meet one or more of the following conditions:
 - a. Youth at risk of dropping out of school. Students at risk for dropping out display certain easily identifiable characteristics, some of which are demographic and some of which are related to their performance in school.

Factors associated with dropping out of high school:

- Comes from a low-income family and has a lack of credits earned
- Poor attendance
- Members of a racial or ethnic minority group
- Poor grades (especially in core courses)
- Older than the average student in their grade
- Pregnant/Parenting
- Substance Abuse
- Youth offender

b. Immigrant Youth.

c. Youth with limited English proficiency.

d. Youth deficient in basic skills. Basic skills deficient means the individual computes or solves problems, reads, writes, or speaks English at or below the eighth grade level or is unable to compute or solve problems, read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society. In addition, states, and grantees have the option of establishing their own definition, which must include the above language. In cases where states or grantees establish such a definition, that definition will be used for basic skills determination.

e. Youth who reside in areas with high rates of poverty, crime and/or unemployment.

f. Youth who have serious barriers to employment, including but not necessarily limited to, stated current or past substance abuse, truancy, absence of positive adult role models, and diagnosed emotional disorders.

By expanding the definition of "youth who need additional assistance" the Local Workforce Development Boards (LWDBs) will be able to serve at-risk youth in a more equitable manner. The following is a list of acceptable source documents required to support an eligibility staff person/case manager identifying a youth as needing additional assistance (clearly identifying which condition the youth met):

1. Individual Service Strategy (ISS).
2. Case Note.
3. WIOA intake of registration form.
4. State MIS.
5. Self-Attestation

Services for Youth (Rehabilitation Specific)

Youth to be served fall into two separate groups: in-school and out-of-school. Both groups are served by different partner agencies, though any individual served by the WDS might be served by all partners, perhaps simultaneously, if eligibility requirements are met. Out-of-school youth are primarily served by WFWV and Adult Education, while in-school youth are primarily served by the State's education system and DRS, for those eligible students with disabilities. Adult Education is prohibited from providing direct services to in-school youth.

In-School Youth

Primary responsibility for services to in-school youth falls, in a general sense, to West Virginia's education system. The primary workforce development needs of all in-school youth is a quality, high school-level education, provided by the teachers in the public and private school systems. Because of this need's precedence, the role of WFWV regarding in-school youth is diminished. Among the WIOA core partners, DRS plays the largest role in the development of in-school youth, albeit only for students with disabilities. Students seeking employment who do not qualify for vocational rehabilitation (e.g., not disabled, does not meet order of selection requirements) are referred from DRS to WFWV as needed. WFWV distributes funding to each of the LWDBs, which are allowed to spend up to 25 percent of their youth funds on WDS activities for in-school youth.

DRS has a long-standing partnership with West Virginia's education system, at both the State and local level. As such, DRS has cooperative agreements with the State Education Agency and each of the 55 Local Education Agencies (County-level Boards of Education) in West Virginia. These cooperative agreements between DRS and the Education Agencies, assure that each student with a disability in the state who needs special education, vocational education, and/or vocational rehabilitation services is identified and that the appropriate services are made available to the individual.

Since the enactment of WIOA, DRS has focused on providing services, particularly Pre-Employment Transition Services (Pre-ETS), to students with disabilities starting in the 9th grade. DRS is now required to reserve at least 15 percent of its budget for the provision of Pre-ETS to students with disabilities. The expected benefits from this include increased counselor presence in schools, increased Individualized Educational Program meeting attendance, increased provision of Pre-Employment Transition Services (Pre-ETS), and an increase in outreach and awareness of VR services to students with disabilities. Counselors will also stay in contact with educators to discuss and attempt to resolve educational difficulties as they arise.

Pre-employment transition services are mandated under WIOA and include the following:

- Job exploration counseling
- Work-based learning experiences, which may include in-school or after school opportunities or experience outside the traditional school setting (including internships), that is provided in an integrated environment to the maximum extent possible
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at an institution of higher education
- Workplace readiness training to develop social skills and independent living
- Instruction in self-advocacy, which may include peer mentoring

In addition to Pre-ETS, DRS debuted the Positive Outcomes within Education and Rehabilitation (POWER) program in 2015, which is a job shadowing program that offers transitioning students, who may be having a difficult time choosing a career path, the opportunity to experience an occupation by spending time with a professional working in the students' vocational goal/career field of interest, including STEM. The POWER program allows the student the opportunity to experience an occupation prior to committing to training. It guides the student to take a serious, realistic look at the occupation, allowing the student to make a more informed choice.

Another DRS activity is STEP. This program utilizes school personnel to facilitate a more seamless transition from high school to post-secondary activities (employment or training) for students with disabilities. By allowing the student to continue working with an individual who has provided them with classroom instruction and/or transition services while in high school, they are working with people who are most familiar with their interests, skills, and barriers to employment. In addition, STEP will also include the use of science and math teachers to provide appropriate students with further career exploration opportunities in STEM fields. These teachers may also provide college preparation activities, such as ACT test preparation, and work-based experiences.

By engaging students with disabilities earlier and providing them with activities such as Pre-ETS, POWER, and STEP, DRS expects recipient students will have a better understanding of the

labor market and the value of obtaining a postsecondary credential. Students with disabilities that are eligible for VR services may, in accordance with their IPE, receive assistance from DRS in obtaining postsecondary training.

DRS counselors are also invited to participate in Individualized Education Plan (IEP) meetings. During these meetings the counselor describes DRS policies, and procedures as appropriate, and determines the student's eligibility and order of selection category utilizing information generated from the school, the student, and West Virginia Division of Rehabilitation Services. Prior to or shortly after the student's IEP transition meeting occurs, Individualized Plan for Employment (IPE) development begins so both the student and counselor have an idea of what rehabilitation services will be necessary to meet the student's vocational goal.

Out-of-School Youth

All core partners are able to serve out-of-school youth who qualify for services. Adult Education works exclusively with out-of-school populations, many of whom are ages 24 and under. The core partners work, in tandem, on many workforce development activities. The partners all have memorandums of understanding (MOU) at the state and regional levels and also collaborate on specific projects at local levels.

The State understands the importance of having a recognized postsecondary degree from the perspectives of both employers and job seekers. Through a combination of partner collaborations, the WDS strives for quality, career-based employment outcomes for its consumers.

For youth with disabilities who do not graduate from high school, DRS works closely with Adult Education, referring individuals as needed, to ensure that these individuals have an adequate opportunity to obtain a completed high school level education. DRS provides assistance, as needed, to Vocational Rehabilitation consumers in Adult Education programs to ensure that individuals have the means to progress through and complete these programs if doing so requires the circumnavigation of functional limitations based on the consumers' disabilities.

West Virginia's adult basic education programs address the needs of adult learners as they strengthen local communities and businesses. Adults who lack the skills and knowledge to fully participate in, contribute to, and benefit from West Virginia's postsecondary education system and economy are eligible to access adult education services in a variety of settings across the state. Core services are offered at all locations to adult learners who meet the federal eligibility requirements for enrollment. These learners:

- Have attained 16 years of age;
- Are not enrolled or required to be enrolled in secondary school under state law;
- Lack sufficient mastery of basic educational skills to function effectively in society; do not have a secondary school diploma or its recognized equivalent, or have not achieved an equivalent level of education; and/or
- Are unable to speak, read, or write the English language.

Beginning in July 2015 under WIOA, adult education and literacy activities were expanded to include 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, and integrated education and training.

Comprehensive interventions are designed to address skill and knowledge deficits across the levels defined in Title II of the Workforce Investment Act of 1998 and Title II of the Workforce Innovation and Opportunity Act of 2014. Building on policies and initiatives created through this comprehensive system of advising, coordination, and support, providers leverage success using innovative processes. These processes unify and inform the delivery of Adult Basic Education (ABE) courses, English as a Second Language (ESL) instruction, and high school credential programs. Following are examples of research-based innovative practices that support the implementation and scaling of college and career pathways that accelerate student completion and foster economic growth.

1. FastTrack Programs-Increasing Transitions from Levels 1, 2 and 3

Funded providers will use key elements of research-based programs, e.g. contextualization, team teaching, and enhanced student services to increase the speed at which students master basic and ESL skills at federal levels 1, 2, and 3.

These condensed courses feature managed intake and managed enrollment and are typically a six to twelve week accelerated program. FastTrack options include, but are not limited to:

Basic Skills FastTrack:

- Programs focused on either English/Language Arts, Mathematics and Numeracy, Science or Writing in Response to Text Career Cluster FastTrack:
- Programs focused on career immersion and career clusters
- Partnerships with Career and Technical Centers
- Partnership efforts between community colleges and community-based organizations and LWDBs
- Workplace projects that partner providers, employers and LWDBs ESL FastTrack:
- Flipped classroom models for ESL

FastTrack students acquire the skills needed to transition to basic skills education classes at federal levels 4-6 and/or Professional/Technical or Academic pathways.

2. Professional/Technical Transitions-Moving Students from Levels 4, 5, and 6 to Postsecondary Success in Professional/Technical Programs

Students who function primarily at federal levels 4-6 can be served in Professional/Technical Transition programs that result in recognized certificates leading to progression along a defined educational and career pathway. It is our hope to make these programs available at every West Virginia community and technical college, and to encourage partnerships with local community based organizations and as part of the education services at state correctional facilities.

- Programs focused on career immersion and career clusters
- Partnerships with Career and Technical Centers
- Partnership efforts between community colleges and community-based organizations and local WDBs
- Workplace projects that partner providers, employers and LWDBs
- Flipped classroom models for ESL

- Developmental and Academic Transition Programs-Moving Students from Levels 4, 5, and 6 to Postsecondary Success in Academic Programs

3. Developmental and Academic Transition programs will employ the same strategies as professional technical transition programs. They will apply these strategies to credit-bearing classes along 2-year degree pathways and ensure accelerated student progress through higher levels of adult education and precollege education and transition into 2-year degree programs.

Expanding Options for High School Credentials, Certificates and Diplomas

In light of changes to options for acquiring high school credentials made by the federal government and the growing importance of these certificates and high school diplomas, West Virginia has expanded the options available to adults. Our goal is to ensure that adult learners acquire the necessary credentials by gaining the knowledge and skills demanded in the workforce and required for postsecondary success. Toward that end, West Virginia will continue to award state certificates linked to the recognized high school equivalency state exam (TASC).

Welfare Reform Initiative

Adult Education has a successful history of collaboration with the State's human services agency. Through a cooperative relationship built on trust and commitment to serving economically disadvantaged West Virginians, the two State agencies work together to respond to the mandates of welfare reform.

SPOKES

In 2003, an academic and job preparation skills program entitled SPOKES was created by Adult Education under a contract between the WVDE Office of Adult Education and Workforce Development and DHHR, and in collaboration with some LWDBs.

The SPOKES program model was also designed to provide intense daily activities that would address academic and soft skills necessary for adults to pursue gainful employment.

Although the program is designed for participants functioning at or above the 4th grade level (FFL 3 and above), there is some flexibility about including participants who score at lower levels. This 4 to 10 week program allows WV WORKS participants to be referred to the program and receive services at the start of each work week. Referrals can be made for the start-up of any week.

The SPOKES program consists of:

- Assessment
- A six-week repeating cycle of modules related to the following components:
 - Employability Skills
 - Job Readiness
 - Work Process Skills
 - Technology Skills-which may include Internet and Computing Core Certification (IC3) ® work
 - Workplace Academic Skills
- Vocational Training starting Week 5 that may include the following:

- Customer Service Part 1
- Customer Service Part 2
- Microsoft® Office Specialist (MOS)
- Internet and Computing Core Certification (IC3)
- Work-based Academic Skills (if applicable in region)
- An additional 2-4 week job readiness component, which includes intense job search. SPOKES participants prepare to take the WorkKeys assessment. A variety of certificates may be earned by participants who complete the program. Participants officially referred to and enrolled in SPOKES classes must have an identified need for instruction and/or enhancement in one or more of the module areas that prevents them from getting employment or advancing in a job. Individualized, computer-aided, small/whole group, and work-based/site instructional techniques are utilized within the program delivery of services.

In addition to having a certified full-time Adult Education SPOKES instructor, and in some cases a part time Adult Education SPOKES instructor, the SPOKES program may have access to a career development consultant (CDC) and share a blended classroom with an Adult Education instructor.

Programs are encouraged to pilot and implement additional evidence and research-based strategies for college and career pathways that meet the goals of this plan.

Pursuant to WIOA, WFWV is required to allocate 75 percent of its local area youth funds to OSY. These funds are used to carry out programs that provide the following elements:

1. Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent;
2. Alternative secondary school services, or dropout recovery services, as appropriate;
3. Paid and unpaid work experiences, including summer employment opportunities and other employment opportunities available throughout the school year; pre-apprenticeship programs; internships and job shadowing; and OJT opportunities;
4. Occupational skill training;
5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
6. Leadership development opportunities;
7. Supportive services;
8. Adult mentoring;
9. Follow-up services for not less than 12 months after the completion of participation, as appropriate;
10. Comprehensive guidance and counseling;
11. Financial literacy education;

12. Entrepreneurial skills training;
13. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area; and
14. Activities that help youth prepare for and transition to postsecondary education and training.

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.

For the purpose of determining whether an individual is an in-school youth (ISY) or out-of-school youth (OSY), school status is based on a determination of school attendance on the date of eligibility determination. Once the school status of a youth is determined, that school status remains the same throughout the youth’s current participation.

- A youth is “not attending” school if the youth:
 - Has had at least 10 consecutive days of unexcused absences and on the date of eligibility determination has not returned to school;
 - Is not attending postsecondary school on the date of eligibility determination;
 - Has not registered for postsecondary school classes on the date of the eligibility determination; or
 - Is enrolled only in non-credit-bearing postsecondary classes.

Additionally, participation in the following programs is not considered being “in school” for the purpose of determining ISY/OSY status:

- Adult education programs provided under Title II of WIOA
- YouthBuild programs
- Job Corps programs
- High School Equivalency programs (not funded by the public K–12 system)
- Dropout reengagement programs (not funded by the public K–12 system)

Note: School attendance and school status determine which eligibility definition (ISY or OSY) may apply.

A youth is “attending school” if the youth:

- is enrolled in any of the following schools:
 1. Public school
 2. Charter school
 3. Private school
 4. Alternative education program;

- Is homeschooled;
- Is attending high school equivalency programs, including those considered to be dropout reengagement programs, funded by the public K–12 system;
- Is a high school graduate who has registered for post secondary classes, even if not yet attending postsecondary classes;
- Is attending postsecondary classes; or
- Is in between postsecondary school semesters and has registered for classes for a future semester or has paid all or part of the tuition for a future semester.

Note: A youth with fewer than 10 consecutive unexcused absences, or with 10 or more non-consecutive unexcused absences is still considered “attending school.”

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.

Basic Skills Deficient- An individual unable to compute or solve problems, read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society. For WIOA purposes, the State further defines Basic Skills Deficient as an individual who:

- Lacks a high school diploma or high school equivalency and is not enrolled in secondary education.
- Enrolled in a Title II Adult Education/Literacy program.
- Reading and/or Math assessment at an 8.9 or below grade level.
- Determined to be Limited English Skills proficient through staff-documented observations.
- Other objective criteria, determined to be appropriate by the local area and documented in its required policy.

D. SINGLE-AREA STATE REQUIREMENTS

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

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

Not Applicable.

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

Not Applicable.

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

Not Applicable.

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.

Not Applicable.

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.

Not Applicable.

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.

Not Applicable.

E. WAIVER REQUESTS (OPTIONAL)

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

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

- C. SUPPORTING WORK-BASED LEARNING;
 - D. IMPROVING JOB AND CAREER RESULTS, AND
 - E. OTHER GUIDANCE ISSUED BY THE DEPARTMENT.
5. DESCRIBES THE INDIVIDUALS AFFECTED BY THE WAIVER, INCLUDING HOW THE WAIVER WILL IMPACT SERVICES FOR DISADVANTAGED POPULATIONS OR INDIVIDUALS WITH MULTIPLE BARRIERS TO EMPLOYMENT; AND
6. DESCRIBES THE PROCESSES USED TO:
- A. MONITOR THE PROGRESS IN IMPLEMENTING THE WAIVER;
 - B. PROVIDE NOTICE TO ANY LOCAL BOARD AFFECTED BY THE WAIVER;
 - C. PROVIDE ANY LOCAL BOARD AFFECTED BY THE WAIVER AN OPPORTUNITY TO COMMENT ON THE REQUEST;
 - D. ENSURE MEANINGFUL PUBLIC COMMENT, INCLUDING COMMENT BY BUSINESS AND ORGANIZED LABOR, ON THE WAIVER.
 - E. COLLECT AND REPORT INFORMATION ABOUT WAIVER OUTCOMES IN THE STATE'S WIOA ANNUAL REPORT.
7. THE SECRETARY MAY REQUIRE THAT STATES PROVIDE THE MOST RECENT DATA AVAILABLE ABOUT THE OUTCOMES OF THE EXISTING WAIVER IN CASES WHERE THE STATE SEEKS RENEWAL OF A PREVIOUSLY APPROVED WAIVER.

TITLE I-B ASSURANCES

The State Plan must include assurances that:

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

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

ADULT PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)				
Employment (Fourth Quarter After Exit)				
Median Earnings (Second Quarter After Exit)				
Credential Attainment Rate				
Measurable Skill Gains				
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

DISLOCATED PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)				
Employment (Fourth Quarter After Exit)				
Median Earnings (Second Quarter After Exit)				
Credential Attainment Rate				
Measurable Skill Gains				
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

YOUTH PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

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

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

of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

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

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

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

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

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

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

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

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

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for

measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

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

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

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)				
Employment (Fourth Quarter After Exit)				
Median Earnings (Second Quarter After Exit)				
Credential Attainment Rate				
Measurable Skill Gains				
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

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

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

A. EMPLOYMENT SERVICE STAFF

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

West Virginia will continue to use state merit staff employees for all programs.

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

West Virginia's workforce development system (WDS) will work with the West Virginia Workforce Development Board (WFDB) to establish a structure to upgrade WDS staff skills so jobseekers and employers are provided a high quality service. WorkForce West Virginia (WFWV) developed an online assessment focused on Employment and Sector Partnering to establish a certificate system that must be completed by all Employment Service (ES) staff. The use and development of this tool will strengthen staff knowledge of Employment Services and partner services which allows for a well trained staff to assist the customer in obtaining the proper services needed for employment. This development also gives staff insight into industry and business in their local area and surrounding local regions.

WFWV will continue to use established professional development activities in order to meet goals, develop staff skills, and ensure a competent Employment Service staff. In addition, we will enhance training curricula that incorporate policies, processes, and input from Wagner-Peyser, Unemployment Insurance (UI), and/or core partner agency staff. Experts in the fields of UI, WIOA, Employment Service and core partner staff will recommend related topics. WFWV will continue to train employees on the pertinent skills needed in the AJC through peer and management direction.

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

As training needs are identified, WFWV will develop curriculum and conduct instructional sessions. Self-paced UI process training tutorials are available via the intranet. These tutorials will be enhanced to incorporate the identification of eligibility issues and appropriate referral for UI adjudication. Training will also be available locally across partner agencies to ensure system cross-training objectives are met. Core partners will be utilizing the same management information system and trained to identify then record UI adjudication issues for further review by UI staff.

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

WFWV's UI and ES staff are fully cross trained to assist individuals access a full range of services. The State maintains a UI presence in each AJC to ensure that customers meet the eligibility requirements during the initial application process and to offer support throughout the entire claim cycle. Eligibility information and claimant rights and responsibilities is also available on the website in a mobile friendly environment.

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

West Virginia claimants are profiled at the time the initial claim is filed to determine the level of assistance and support necessary to return to work. New and additional claims are taken online, and the information is reviewed for UI eligibility. Courtesy calls are attempted for each new claim filed where center services are reviewed, labor market information is examined, and labor exchange (ES) services are required. Every claimant is advised of the requirement to be able, available, and actively seeking full time work for each week UI is claimed and must attest to the number of job contacts made during the week claimed. They are advised they must apply and accept suitable work, based on their work experience, training and claim duration. UI eligibility requirements and the consequences for failing to meet them are reviewed during the benefit rights section and are available for further review online or through handout materials by visiting a local office or itinerant site.

In addition, those selected to participate in UI Reemployment Services and Eligibility Assessment (RESEA) will receive all of the mandatory program components to include the creation of an Individualized Education Plan and additional services such as job search workshops, job search assistance or referrals to other partner programs. The RESEA workshop is designed to motivate and encourage those likely to exhaust benefits by exploring previous work experience, accomplishments and unique skill sets and how to effectively use them while job searching. During the workshop individuals identify strengths and skill sets, set short and long term goals, begin developing a job search plan, and effectively network both in person and using social media.

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

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

WFVV's UI and ES staff are fully cross trained to assist individuals access a full range of services. Concentrated, individualized and group services including reemployment assessment, continuing eligibility and job placement are provided to claimants identified as either most or least likely to exhaust benefits. Regionalized claimant-centered labor market information is available through handouts or via <https://workforcewv.org/>.

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

WFVV applies an early-intervention approach to delivering services to unemployment compensation recipients. Claimants are dual enrolled from day one for Wagner-Peyser reemployment services and provided an orientation to all available One-Stop services. Information is provided to claimants who file online where detailed information is conveyed about available partner services and WIOA training eligibility and available opportunities. Common data is uploaded daily from the UI mainframe to the ES registration system.

3. ADMINISTRATION OF THE WORK TEST FOR THE STATE UNEMPLOYMENT COMPENSATION SYSTEM, INCLUDING MAKING ELIGIBILITY ASSESSMENTS (FOR REFERRAL TO UI ADJUDICATION, IF NEEDED), AND PROVIDING JOB FINDING AND PLACEMENT SERVICES FOR UI CLAIMANTS; AND

The State administers the unemployment insurance work test as required. Claimants who fail to participate or report to suitable opportunities are held ineligible until issues are resolved. The UI management information system identifies potential eligibility issues by the claimant's responses to weekly certification questions and by assessing the data entered by staff during eligibility assessments. Any job referral made is reconciled either by the claimant or by the employer or both. The management information system (MACC) generates a follow-up form to the employer 15 days from the last referral. When returned, the results are populated to the UI system and a stop is placed on payments of claimants who failed to report.

4. PROVISION OF REFERRALS TO AND APPLICATION ASSISTANCE FOR TRAINING AND EDUCATION PROGRAMS AND RESOURCES.

WFWV ES/UI staff will coach and direct claimants to educational opportunities if training is advisable for the desired employment outcome. Income test information will be provided to assist the customer apply for available financial aid. Cost and performance data, when available, will be available for review so customers will be able to make informed decisions on schooling. Joint partner staff training sessions will provide information and resource tools for staff to guide their referrals.

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.

Farmworker Unique Needs

These items listed below are based upon comments from employers, association members, community agencies/partners, and outreach workers

Generally, those farmworkers traveling into the state for work may have limited money and may need information from community resources, such as those listed below:

- language assistance/translation services and ESL classes;
- career assessment /counseling for family members;
- legal assistance in applying for available or new citizenship or visa programs;
- transportation and/or driver's education/training to obtain a valid driver's license;
- housing and shelters for the homeless;
- assistance obtaining personal loans to purchase housing and land to meet family needs;
- assistance from local food pantries;
- additional work clothing and/or clothing for family members;

- education and training to operate new advanced farming equipment;
- job training/job shadowing which is connected to educational credit;
- computer classes;
- health assessments;
- dental services;
- information/referrals for self-care-mental health, control of medical issues such as diabetes, high blood pressure, drug and alcohol counseling and heat related illnesses;
- families may need-education assistance such as tutors
- housing that is appropriate to meet the privacy needs of women and children;
- assistance understanding their farmworker rights;
- assistance recognizing contract violations and filing complaints.

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

1. The current identified top five labor-intensive crops, the months of heaviest activity, and geographic locations are:

- Hay and hay products: May through September- Jackson, Greenbrier, Preston, Hampshire and Mason counties
- Grain, dry beans and peas: April through October- Mason, Jefferson, Hardy, Preston, Pendleton, Wood, Randolph, Berkeley and Monroe counties
- Nursery, greenhouse, floriculture and sod: February through June-Mason, Putnam, Mercer and Raleigh counties
- Fruits and berries: May through October -Jefferson, Berkeley and Morgan counties
- Vegetables, melons, potatoes and sweet potatoes: July through early September- Jefferson, Mason and Cabell counties

2. As the scarcity of farm workers persists, agricultural employers continue to utilize family and friends at small to medium farms. However, large agricultural employers rely on the limited local domestic farm workers, many of whom are older and may choose to work on a part-time schedule. Additionally, it is getting more difficult for employers to obtain foreign workers at the time they need them. There are tighter border controls and delayed processing times for H2-A workers. Employers complain that the delayed arrivals of foreign workers and some early departure times are interfering with the employer's ability to ensure that all required work is completed. Although some of the large farms are equipped with advanced technology to assist in day-to-day operations, most farm work remains labor intensive and requires the "hands on"

application.

Each year some agricultural employers must rely on acquiring agents to file their applications for foreign labor certification with the Department of Labor and the process is costly. Therefore, the employer must determine if it is financially prudent to invest in getting foreign workers who may or may not arrive when they are needed. Their major concern is how investing in obtaining foreign workers will impact their bottom line or return on investment.

3. Current or projected economic, natural and other factors affecting agriculture:

- Climate change will continue to impact state agricultural production. Extreme temperatures have been experienced in the Eastern Panhandle where the fruit matured early and there was an insufficient number of available workers to harvest the fruit. Employers lost their products and associated revenue.
- Agricultural employers realize that to be competitive they must extend the growing season using high and low tunnels which will allow them to grow their products inside with protection from the weather changes. This is an additional expense for equipment and more workers are needed.
- A few agricultural employers found a way to increase revenue by adding hemp to their farm products and have started growing the plant legally for medical research purposes.
- The Migrant and Seasonal Farmworker (MSFW) population contains an increased number of foreign visa workers who are employed under the United States Department of Labor H-2A program.
- The aging MSFW population is an issue because they comprise the bulk of reliable, knowledgeable farm workers.
- The lack of domestic workers means that employers will need to maintain approved housing and safe reliable transportation to meet the needs of foreign workers.

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

The MSFWs coming into West Virginia are primarily from Florida, Haiti and Mexico. Their languages include Spanish, Creole, and Haitian while many speak limited English as a second language.

The Eastern Panhandle has seen an influx in farm workers from Ethiopia who speak Amharic as well as agricultural workers from Myanmar (Burma) whose primary language is Burmese.

However, many of them found work at a local poultry plant. Also, there has been a decrease in the number of Haitian workers coming to the state due to visa related problems.

During the peak season statewide, there are up to 500 MSFW workers employed in the state. This includes year-round workers, seasonal workers and migrant seasonal workers (with H2-A foreign workers).

Many of the farm workers at peak season are migrants from the southeastern United States as well as H2-A workers. During the slower agricultural period, domestic year-round workers may be as low as 100 to 200 workers performing essential farming tasks.

4. OUTREACH ACTIVITIES

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

1. The State Workforce Agency (SWA) works with partner agency staff to assist in locating and contacting MSFWs who do not come into the local WorkForce West Virginia (WFWV) offices. These workers may seek assistance from Telamon Corporation staff, Catholic Charities or from Shenandoah Valley Health Services. These agencies have staff who are familiar with the employment services offered at WFWV offices and we have planned quarterly meetings to review services available to this special population.
2. Technical assistance is ongoing for WFWV staff and some training is open to partner agency staff such as reporting complaints. All outreach staff are provided training and some may attend special training offered by the U.S. Department of Labor (DOL) designed to assist MSFWs. Virtual and in-person training is provided using the MSFW manual.
3. Training has been provided to outreach staff on Unemployment Insurance (UI) benefits and will be included on the regular training agenda for updates.
4. Professional development is included in the schedule of ongoing training.
5. WFWV collaborates with the National Farmworker Jobs Program (NFJP) grantee and we have a memorandum of understanding that defines our level of cooperation. However, the NFJP grantee, Telamon Corporation, is not a subrecipient for WFWV to provide outreach.

WFWV provides the full range of employment and training services to both the farmworkers and the agricultural employers, through the one-stop delivery system.

In the field, MSFW outreach staff utilize the following strategies to provide services via personal contact and/or translators to communicate with workers. At the American Job Center and in the field, staff use written materials such as brochures and fact sheets printed in the language familiar to the workers in order to inform MSFW workers about all of the services available to them at no charge. Outreach workers have laptop computers and/or iPads to complete orientation and registration of applicants and to aid them in meeting their need for supportive services, counseling and job development.

Additionally, there are computers which contain Spanish language registration instructions. Should any MSFW worker require or request career and training services which are available under WIOA Title I to enhance their skill level or to transfer into another career, services are

adapted to meet the needs of that specific customer by sending a staff person to assist him in the field or to provide transportation into the American Job Center for assistance.

Agricultural employers are given written information about the full array of services available to them through the local American Job Center and they are encouraged to visit the facility. Each year local American Job Center staff and outreach workers are encouraged to add new agricultural employers to their visitation list. The State Monitor Advocate (SMA) attends annual conferences sponsored by university agricultural departments and agricultural associations to promote WFWV services. The SMA, MSFW outreach staff and local office staff attend local fairs and special community events such as the Apple Harvest, Peach, Blackberry and Strawberry Festivals, etc. to inform the agricultural employers about the full range of employment and training services offered at the local American Job Center. Each year, the agricultural associations, employers and public/private agencies involved with agriculture are invited to provide information for inclusion in the state Agricultural Outreach Plan.

The complaint system is marketed to employers and other farmworker advocacy groups as a tool to assist the employer in meeting state and federal compliance. All printed materials relative to the program include information on how to obtain materials and include contact information for staff assistance to file Employment Service complaints.

The marketing of the Agricultural Recruitment System to employers helps provide more visibility for their business which may attract more workers. Representatives from WFWV routinely make site visits to discuss a full array of services available to the employer.

The NFJP grantee memorandum of understanding (MOU) is reviewed and updated as needed. The MSFW Partner Agency group will continue to meet quarterly and work toward joint community event planning and to increase our outreach capacity via the partners. The state will continue to collaborate with the National Farmworker Jobs Program grantees and the Local Workforce Development Board (LWDB). The state will work toward identifying the two National Farmworker Jobs Program grantees and their respective directors who are operating components of this program in West Virginia and work with them to streamline and coordinate services in a seamless manner.

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

West Virginia has developed a new service delivery strategy within the last four years. The State Monitor Advocate (SMA) and WorkForce West Virginia (WFWV) staff trained outreach workers in each WFWV office to be able to assist agricultural employers, farmworker living areas, and places where farmworkers meet to provide printed materials to farmworkers in a language they understand. These materials contain the full array of services such as employment, training, education, unemployment benefits and support services. Each local WFWV office manager and one other staff person have been trained to serve as outreach staff. The development and distribution of a comprehensive MSFW Handbook occurred in July 2017 with the Field Management Team and will be updated as needed. Staff will continue to be trained during the quarterly meetings.

B. PROVIDING TECHNICAL ASSISTANCE TO OUTREACH STAFF. TECHNICAL ASSISTANCE MUST INCLUDE TRAININGS, CONFERENCES, ADDITIONAL RESOURCES, AND INCREASED COLLABORATION WITH OTHER ORGANIZATIONS ON TOPICS SUCH AS ONE-STOP CENTER SERVICES (I.E. AVAILABILITY OF REFERRALS TO TRAINING, SUPPORTIVE SERVICES, AND

CAREER SERVICES, AS WELL AS SPECIFIC EMPLOYMENT OPPORTUNITIES), THE EMPLOYMENT SERVICE AND EMPLOYMENT-RELATED LAW COMPLAINT SYSTEM (“COMPLAINT SYSTEM” DESCRIBED AT 20 CFR 658 SUBPART E), INFORMATION ON THE OTHER ORGANIZATIONS SERVING MSFWs IN THE AREA, AND A BASIC SUMMARY OF FARMWORKER RIGHTS, INCLUDING THEIR RIGHTS WITH RESPECT TO THE TERMS AND CONDITIONS OF EMPLOYMENT.

Technical assistance continues to be provided to outreach workers which may include training sessions, conferences, additional resources, and increased collaboration with other organizations on topics such as American Job Center services, the employment service complaint system, information on other organizations serving MSFWs, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment. Additionally, this information is shared among the MSFW Partnership group which meets quarterly and involves agencies that offer services to farmworkers. The MSFW Partners include representatives from the following organizations: National Farmworker Jobs Program, Telamon Corporation, Job Corps, Community Colleges and Higher Education, Catholic Social Services, Shenandoah Valley Health Services, Occupational Health and Safety Agency, Department of Health and Human Resources and WFWV.

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

Technical assistance and training are available for WFWV merit staff at all American Job Centers for professional development activities to ensure they can provide high quality services to both jobseekers and employers. Such training will include information regarding the availability of core programs including the Unemployment Insurance (UI) program and training on identifying unemployment eligibility issues.

UI staff trained the MSFW outreach staff to explain unemployment services and benefits as well as the process for MSFWs to access the system. A printed brochure was developed to outline the unemployment program and easy access steps for obtaining assistance.

D. PROVIDING STATE MERIT STAFF OUTREACH WORKERS PROFESSIONAL DEVELOPMENT ACTIVITIES TO ENSURE THEY ARE ABLE TO PROVIDE HIGH QUALITY SERVICES TO BOTH JOBSEEKERS AND EMPLOYERS

The state will utilize the continuous training sessions and seminars offered by the National Monitor Advocate (NMA) and the Regional Monitor Advocate (RMA) to enhance the train-the-trainer services that are offered to the statewide employment service workers including outreach staff. The plan is to ensure that all staff understand the necessity for providing all customers, including MSFWs, with the full array of quality services. In order to comply with this requirement, employment service workers, outreach workers and management staff view MSFW services as a continuation of services that must be provided such as job referrals, training, education, supportive services, labor market information, complaint services and unemployment insurance. In the train-the-trainer format, the local WFWV office manager is responsible for training local office staff.

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

WorkForce West Virginia (WFWV) staff maintain coordination with our community partners on housing inspections, field checks, field visits and some community events. WFWV staff will continue to exchange printed materials which are written in the various languages spoken by Migrant Seasonal Farm Workers. Staff continues to explore ways to ensure that Migrant Seasonal Farm Workers are personally contacted or that they receive employment services information and materials through our partner agencies.

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

Describe the State agency's proposed strategies for:

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

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

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

In the field, MSFW outreach staff provide services via personal contact and/or translators or translation devices to communicate with farmworkers. At the American Job Center and in the field, staff use written materials such as brochures, flowcharts and fact sheets printed in the language familiar to the workers in order to inform MSFWs about the core, intensive, training and career services available to them at no charge. Outreach workers have laptop computers and cellphones to complete orientation and registration as well as to aid them in meeting the customer's needs for supportive services, counseling and job development.

Additionally, there are computers including laptops which contain Spanish language registration instructions. Should any MSFWs require or request career and training services which are available under WIOA Title I to enhance their skill level or to transfer into another career, services are adapted to meet the needs of that specific customer by sending a staff person to assist him in the field or to provide transportation into the American Job Center for assistance.

Agricultural employers are given written information about the full array of services available to them through the local American Job Center and they are encouraged to visit the facility. Each year local American Job Center staff and outreach workers are encouraged to add new agricultural employers to their visitation list. When available, the State Monitor Advocate (SMA) or outreach workers attend annual conferences sponsored by university agricultural departments and agricultural associations to promote WorkForce West Virginia (WFWV) services. Each year the agricultural associations, employers and public/private agencies involved with agriculture are invited to provide information for inclusion in the state Agricultural Outreach Plan.

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

The career and training services required under WIOA Title I will be provided by using trained staff, translators/translation devices and brochures which outline all employment services and

training programs, register customers, assess their needs, refer customers for supportive services, inform customers of their rights, etc. utilizing available technology.

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

WFWV is committed to continuous improvement and actively seeks feedback from employers and farm workers regarding their needs and suggestions for improvement. WFWV in conjunction with the NFJP staff re-designed the agricultural forums offered to employers by having a pre-harvest and post-harvest meeting. WFWV has utilized the new agricultural employer forum format starting in 2020 to communicate with employers and to conduct on-site visits. In February 2020, Wage and Hour staff agreed to conduct ongoing pre-harvest visits and to work with employers on compliance during their discussions at the employer forum.

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

The Complaint System is marketed to employers and other farmworker advocacy groups as a tool to assist the employer in meeting the needs of their workers and meeting state and federal compliance while maintaining consistency in these areas. All printed materials relative to the MSFW program include information on how to obtain forms and instructions related to the Employment Services Complaint System. The complaint packet includes staff contact information for assistance to file complaints with Employment Services, instructions and addresses regarding other enforcement entities responsible for processing complaints. Outreach workers and the SMA provide on-site visits and check for the required complaint posters on bulletin boards and ask workers about their knowledge of the complaint system and how to use it.

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

Marketing the Agricultural Recruitment System to employers entails educating them on how this online system offers more visibility for their businesses which may attract more domestic workers. Business Services staff from WFWV routinely make site visits to discuss the full array of services available to the employer. Information on services includes program changes, wage and hour updates, OSHA news, and topics of interest are shared through in-person visits, electronic resources, and conference calls.

WFWV has joined with other MSFW service providers including National Farmworkers Jobs Program grantees to ensure we do not duplicate services but offer wrap-around services, whenever possible. And we strive to evaluate the customer's needs in order to offer continuous relevant services.

6. OTHER REQUIREMENTS

A. COLLABORATION

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

The state will continue to collaborate with our National Farmworker Jobs Program (NFJP) grantees and other service providers. The MSFW Partner Agency group will continue to meet quarterly and work toward joint community event planning and to increase our outreach capacity via the partners. The state will continue to collaborate with the NFJP grantees and the Local Workforce Development Board (LWDB). The state will exchange information with these groups and seek inclusion in the establishment of the LWDB and NFJP Memorandum of Understanding. The state will work toward identifying the two NFJP grantees and their respective directors who are operating components of this program in West Virginia and work with them to streamline and coordinate services in a seamless manner.

B. REVIEW AND PUBLIC COMMENT

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

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

The WIOA State Plan was posted on our website at workforecewv.org in January 2020. All agricultural employers, associations, public agencies, MSFW partners and interested parties were sent an email to go to <https://www.workforcewv.gov> to review the 2020 Agricultural Outreach Plan. The SWA received comments from two (2) Local Workforce Investment Board Directors and four (4) agricultural employers have provided information; two (2) gave written statements and two (2) gave verbal information, during field visits, that were posted on the 2020 Agricultural Outreach Plan.

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

Based upon Wagner-Peyser reports, the SWA has all but two (2) required data elements.

1. Placement in long-term non-agricultural employment for MSFWs – Most MSFWs are domestic workers that are seeking seasonal work only; and they **are not** interested in receiving employment services.
2. Job development MSFWs – Most workers tend to be in their mid-twenties up to middle-aged males who already have secured work with employers before they left during the last agricultural season. They return to work for the same employer each year or quickly find a new employer based upon information from family or friends.

Plan: The SWA is working with agricultural employers and partner agency staff offering MSFWs the full array of employment services and emphasizing sustainable employment.

D. ASSESSMENT OF PROGRESS

The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

The SWA met the goals listed below:

- Added video conferencing as a training tool
- The SWA created and maintains a statewide MSFW Operations Handbook.
- Field translation services to assist our workers outside of the office

The SWA did not meet the goal of adding additional community partners, as indicated in the last AOP document. The focus will be to engage partners to receive assistance in providing education/consultation services to our Agricultural employers. Our hope is to attract these agencies to join our efforts to serve MSFWs and increase community visibility as well as cooperation among the partners. It is our intent to continue moving forward in creating and maintaining a MSFW Partnership program which meets the needs of MSFWs and their families.

E. STATE MONITOR ADVOCATE

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

The State Monitor Advocate is the author of this Agricultural Outreach Plan and reviewed and approved the AOP.

WAGNER-PEYSER ASSURANCES

The State Plan must include assurances that:

The State Plan must include	Include
1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3));	Yes
2. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;	Yes
3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or	Yes

The State Plan must include

Includ
e

agency cooperates with the agency that administers Wagner-Peyser Act services, Adult and Dislocated Worker programs and Youth Programs under Title I; and

4. SWA officials:

Yes

- 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.

WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)				
Employment (Fourth Quarter After Exit)				
Median Earnings (Second Quarter After Exit)				
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

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

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

The Unified or Combined State Plan must include a description of the following as it pertains to adult education and literacy programs and activities under title II of WIOA, the Adult Education and Family Literacy Act (AEFLA).

A. ALIGNING OF CONTENT STANDARDS

Describe how the eligible agency has aligned its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

In 2014 West Virginia Adult Education adopted the College and Career Readiness Standards (CCRS) for Adult Education. Thereafter, in 2016, the West Virginia Board of Education implemented West Virginia College and Career-Readiness Standards for English Language Arts and Mathematics which were developed through the collaborative efforts of West Virginia teachers, parents, and business and community stakeholders that address the learning needs of West Virginia’s students. West Virginia Adult Education has continued to use the CCRS for Adult Education, as they are aligned with the WVCCR standards.

B. LOCAL ACTIVITIES

Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that

provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

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

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

West Virginia Adult Education expects to award grants on a multi-year cycle with an annual continuation grant submitted. Each year's renewal will be based on evidence of success in provision of the contracted services and subject to the availability of funds. West Virginia Adult Education will use the following process to distribute funds to approved applicants: 1. shall use not less than 82.5 percent of the grant funds to award grants and contracts under Section 231 and to carry out Section 225, Programs for Corrections Education and Other Institutionalized Individuals, of which up to 20 percent of such amount shall be available to carry out Section 225; 2. shall use not more than 12.5 percent of the grant funds to carry out State leadership activities under Section 223; and 3. shall use not more than 5 percent of the grant funds, for administrative expenses of the eligible agency.

As part of the application process West Virginia Adult Education will collect basic information from the eligible provider (e.g., location, service area, scope of the program, demographics served, demonstrated need, data collection, and fiscal management procedures). Additionally, each applicant will be required to submit a proposed budget and program design information. Applicants will be expected to respond to West Virginia Adult Education priorities and the Title

If considerations for funding Adult Education and Family Literacy Act (AEFLA) programs. The requirements to be considered include:

1. Needs Assessment: The degree to which the provider is responsive to (A) regional needs as identified in the local plan under section 108; and (B) serving individuals in the community who are identified in such plan as most in need of adult education and literacy activities, including individuals who have low levels of literacy skills and who are English language learners.

2. Individuals with Disabilities: The degree to which the provider is able to serve eligible individuals with disabilities, including eligible individuals with learning disabilities.

3. Past Effectiveness: The degree to which the provider demonstrates past effectiveness in improving the literacy of eligible individuals, to meet state-adjusted levels of performance for the primary indicators of performance described in section 116, especially with respect to eligible individuals who have low levels of literacy.

4. Alignment with One-Stop Partners: The degree to which the eligible provider is responsive to, and demonstrates alignment between, proposed activities and services and the strategy and goals of the local plan under section 108, as well as the activities and services of the One-Stop partners.

5. Intensity, Quality, and Instructional Practices: The degree to which the eligible provider's program is of sufficient intensity and quality and based on the most rigorous research available so that participants achieve substantial learning gains; and uses instructional practices that include the essential components of reading instruction.

6. Research-Based Educational Practices: The degree to which the eligible provider's activities, including reading, writing, speaking, mathematics, and English language acquisition instruction, are based on the best practices derived from the most rigorous research available and appropriate, including scientifically valid research and effective educational practice.

7. Effective Use of Technology: The degree to which 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. Integrated Education and Training: The degree to which the eligible provider's activities offer 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. Qualified Staff: The degree to which the eligible provider's activities are delivered by well-trained instructors, counselors, and administrators who meet minimum qualifications established by the state, where applicable, and who have access to high quality professional development, including through electronic means.

10. Partnerships and Development of Career Pathways: The degree to which the eligible provider's activities coordinate with other available education, training, and social service resources in the community, postsecondary educational institutions, institutions of higher education, Local Boards, One-Stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways.

11. Flexible Schedules and Coordination with Support Services: The degree to which the eligible provider's activities offer 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. Data Collection: The degree to which the eligible provider maintains a high-quality information management system that has the capacity to report measurable participant outcomes (consistent with section 116) and to monitor program performance.

13. English Language Acquisition and Civics Education: The degree to which the eligible provider has a demonstrated need for additional English language acquisition programs and civics education programs.

West Virginia's adult education and literacy programs assist adults in becoming literate and obtaining the knowledge and skills necessary for employment and self-sufficiency, assists adults who are parents in obtaining the educational skills necessary to become full partners in the educational development of their children, and assists adults in completing a secondary school education. Adult education and literacy programs provide direct and comprehensive services to enrolled adult students.

According to the Workforce Innovation and Opportunity Act (WIOA), Title II, the Adult Education and Family Literacy Act, adult education services are to be targeted for:

- adults who are 16 years of age or older;
- adults who are not enrolled or required to be enrolled in secondary school under State law; and who...
- are basic skills deficient
- do not have a secondary school diploma or its recognized equivalent and have not achieved an equivalent level of education or
- are English language learners.

West Virginia law mandates that students must attend school until age 17, unless they have a specific waiver. Certain counties have additional rules. All young adult students under age 18 must present official documentation of withdrawal from school or documentation of an exemption.

Students who are enrolled in post-secondary education or job training programs (e.g., colleges, apprenticeship programs, vocational/technical schools, etc.) may be co-enrolled in West Virginia Adult Education programs. In addition, the instruction provided by West Virginia Adult Education in reading, writing, math, or English language acquisition must be designed to help students meet the requirements for enrollment in nonremedial, for-credit courses in postsecondary educational institutions.

Federal adult education legislation does not specify the need to prove legal status of English language learners (ELLs) as a condition for enrollment in adult education classes. Thus, it is not necessary for foreigners to present passports, visas, work permits, or Social Security cards to prove legal status in order to enroll. However, foreign students (with F-1 Visas) enrolled in universities or private English language institutes may not simultaneously enroll in publicly funded adult education programs. ELLs in this country as nannies or au pairs on a J-1 Exchange

Visitor Visa are required to participate in college level academic classes, not in adult education or literacy classes; therefore, per West Virginia Adult Education policy these persons should not be admitted to adult basic education classes.

ELLs who have completed post-secondary education in another country but lack English language skills MAY enroll in West Virginia Adult Education programs as long as they do not have an F-1 (or J-1 Visa in certain categories).

West Virginia Adult Education programs require that all persons shall have equal access to its programs, facilities, and services without regard to:

- race
- color
- religion
- national origin
- sex
- age
- marital status
- disability
- or sexual orientation

It does not discriminate in admission to its programs, services, or activities, in access to them; in treatment of individuals with disabilities; or in any aspect of their operations. Individuals with documented disabilities may request reasonable accommodations for assessment and instruction.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

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

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and

- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

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

The West Virginia Office of Adult Education will ensure that the same grant announcement, application process and review process is made available to all eligible providers, including correctional education and education programs providing services to institutionalized participants. These measures will ensure that the West Virginia Office of Adult Education meets requirements to provide (1) all eligible providers with direct and equitable access to apply and compete for grants or contracts under this section; and (2) the same grant or contract announcement process and application process will be used for all eligible providers in the State.

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 West Virginia Department of Education Office of Adult Education will use no more than 20 percent of the 82.5 percent of the state grant that must be allotted to local programs for activities under Section 225. West Virginia adult education and family literacy sub-grant recipients use funds, as allowable, to provide educational programs for criminal offenders in correctional institutions and other institutionalized individuals. The Adult Education office will give priority to programs serving individuals who are likely to leave the correctional institution within five years of participation in the program. Local activities include adult basic education, workplace adult education and literacy activities, family literacy activities, and/or English language acquisition.

The Office of Diversion and Transition Programs will also offer co-enrollment in CTE programs, where available. It is anticipated that these programs will take place, at a minimum, in State Prisons

West Virginia Office of Diversion and Transition Programs (WV ODTP) prepares incarcerated adults for successful transition to school, employment, and to life in their communities as responsible and productive citizens.

This is done by:

- offering innovative, research-based educational opportunities, best practices and approaches
- teaching the content, skills and attitudes for success in school, community and the workplace
- providing the appropriate academic, social and vocational skills development and transitional services
- collaborating with others vested in achieving the same outcomes
- employing and encouraging dedicated, quality staff throughout the organization

- acting as a role model and mentor for students to learn positive attitudes and behaviors and high standards of ethical and moral conduct
- being accountable and fostering performance improvement
- reducing recidivism through education
- advocating the value of each individual's re-entry into the community
- promoting successful reintegration into school, community and the workplace
- encouraging participation in educational opportunities, including career technical education co-enrollment
- supporting all aspects of classroom operations to ensure a quality environment for teaching and learning

D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

Describe how the State will establish and operate Integrated English Literacy and Civics Education programs under Section 243 of WIOA, for English language learners who are adults, including professionals with degrees and credentials in their native countries, including how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities.

Describe how the State will fund, in accordance with the requirements of title II, subtitle C, an Integrated English Literacy and Civics Education program and how the funds will be used for the program.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate with the local workforce development system and its functions to carry out the activities of the program.

West Virginia Adult Education will consider whether an eligible provider has demonstrated the need for these types of services through its use of data sources that may include tables from the U.S. Census Bureau, reports from the Office of Immigration Services, and documentation of prior participation in these types of services, or other data. West Virginia Adult Education will award grants for a multi-year period with yearly grant contracts. Renewal of the grant for the continuation years will be based on evidence of success and subject to the availability of funds.

Programs applying for Integrated English Literacy and Civics Education (IELCE) funds under Section 243 will be required to provide IELCE instruction that includes integrated education and training activities. Educational services will be provided for English Language Learners, including professionals with degrees and credentials in their native countries, that enables them to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers and citizens in the United States. Applicants will be required to provide extensive data to demonstrate the need and potential for success of IELCE activities in conjunction with integrated education and training in the proposed service area. Such data will include, but not be limited to, immigration trends, demographics of the

English language learners in the area where the program will be provided, and employment and labor market statistics for the area. In addition, applicants will be asked to provide evidence that they have developed or will be able to develop in a timely fashion, partnerships that support the purpose of the program. Applicants will be required to provide assurances that the occupational training included as part of the program will be provided by qualified providers. Funding under this title will be awarded based upon the criteria for evaluation of program applications contained in Section 231(e) of WIOA.

West Virginia Adult Education will ensure that the same grant announcement, application process and review process is made available to all eligible providers. These measures will ensure that West Virginia Adult Education meets requirements to provide all eligible providers with direct and equitable access to apply and compete for grants or contracts under this section. Through a competitive Request for Proposal (RFP), the West Virginia Adult Education will award grants on a multi-year basis.

IELCE program(s) use regional labor market information showing in-demand industries and occupations from which employer partnerships are established. In cooperation with the employer, a specific educational pathway will be determined. Elements that may be included are workplace employability skills, contextualized English workplace vocabulary, and industry-recognized stackable credentials.

IELCE program(s) work with local workforce development boards to provide training on online job search skills and resume writing. Workforce provides weekly on-the-job training opportunities and individuals are referred whom may be qualified for these positions. Regional labor market results are used to develop integrated training opportunities.

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

West Virginia collaborates with other core programs and one-stop partners to implement strategies of the Combined Plan. All funded providers will be required to detail the process that will be used to collaborate with all stakeholders. All providers will describe how they will fulfill one-stop responsibilities in their region. All providers have representation with their Regional Adult Education Coordinator as members of local Workforce Development Boards to participate in ongoing plan development and implementation of WIOA.

Career pathway programs are a "series of connected education and training programs and support services that enable individuals to secure employment within a specific industry or occupational sector, and to advance over time to successively higher levels of education and employment within that sector" as reported by Jenkins and Davis in *The Career Pathways How-To Guide* published by the Workforce Strategy Center in October 2006. Career pathways often include "stackable" credentials and accelerated courses offered at flexible times that support student entry and exit along the pathway.

Bridge programs, one of the first steps in a career pathway for low-skill adults, support the transition from adult education to the next step in an occupational pathway. By connecting adult education programs to CTE and community college occupational programs, bridge programs seek to increase the rates at which low-skill adults move into postsecondary occupational programs, persist in these programs, and obtain postsecondary credentials in industries offering family-sustaining wages and career advancement.

Bridge programs help adult students identify career and education goals and develop the skills, content knowledge, and learning strategies they need to enter and succeed in postsecondary education and employment. They combine basic skill instruction in reading, math, writing, and English language, including preparation for the high school equivalency test, with occupational content, employability skills, and postsecondary success strategies. Some Bridge programs also offer college credit and certificates, which may be the first step toward a college degree. State and local labor market information is used to develop Bridge programs focused on occupations or industry sectors with a high demand for employees. These programs are designed to prepare individuals for productive futures and meet the State's need for well-trained and industry-certified technical workers.

Adult Education is partnering very closely with CTE to create Bridge Programs to the CTE adult programs offered in many of the CTE centers. In addition, Adult Education collaborates closely with the Community College System of West Virginia in establishing a clear pathway for adult students.

Required: Establish or operate high quality professional development programs to improve adult education instruction including:

- **incorporating essential components of reading instruction**
- **instruction related to specific needs of adult learners**
- **instruction provided by volunteers or other personnel**
- **dissemination of information about models and promising practices**

The goal of a good professional development program is to support and continuously improve adult education programs. West Virginia Adult Education continues to design, implement, and operate a large-scale, statewide professional development system to increase program outcomes.

The professional development team carries out this vision by using state leadership funds to plan, coordinate, and continue implementation of the College and Career Readiness Standards (CCRS) for all eligible providers in the state. The professional development team provides support in the form of in-depth training for the implementation of standards-based instruction both in English language arts and mathematics. State leadership funds are used to hold conferences and training sessions to ensure ongoing professional development in standards-based instruction and other West Virginia Adult Education priority areas. Additionally, state leadership funds are used to design, facilitate, and offer access to online courses covering the areas of competency-based reading instruction, writing, numeracy, basic and multilevel ESOL classes, ABE instruction, ASE instruction, and other research-based practices which lead to program improvement.

Required: Provision of technical assistance to local providers receiving funds including –

- **Development and dissemination of instructional and programmatic practices based on best available research in reading, writing, speaking, mathematics, English language acquisition, distance education, and staff training**
- **Role of local providers as one-stop partners**
- **Assistance in use of technology including staff training and improving efficiencies**

State leadership funds are used to develop and maintain the West Virginia Adult Education Teacher Group within Schoology for the purpose of disseminating instructional and programmatic practices to eligible providers. In addition, funds are used to maintain the West Virginia Adult Education website with information for interested parties in need of adult education resources. The West Virginia Adult Education website shares resources such as publications; CCRS; distance education software; digital media; and information on career pathways information, program management, assessments, and special populations. On-site technical assistance is available to all programs.

West Virginia Adult Education has Technology Integration Specialists (TIS) who provide training and support to staff on technology integration. They assist programs in the use of technology to enhance learning, model and explain the use of blended learning to increase student participation in distance education, ensure all instructional staff are proficient in the use of Microsoft Office for productivity and communication, provide guidance for the proctoring of industry-recognized credential exams, and support instructional staff with basic technology troubleshooting techniques.

Required: The monitoring and evaluation of the quality of, and the improvement in, adult education and literacy activities and the dissemination of information about models and proven or promising practices within the State.

West Virginia Adult Education plans to use state leadership funding to support monitoring and evaluation activities. All adult education programs are monitored to ensure compliance with the National Reporting Standards (NRS), as well as state standards. In West Virginia, this is done in two ways, Data Quality Audits (DQA) and On-Site Monitoring (OSM) visits. One hundred percent of programs will be monitored annually through the use of Desktop Monitoring. A minimum of 15% will be monitored annually via on-site visits. All programs will be monitored on a recurring cycle. The programs identified for on-site monitoring are selected using a Class Ranking Report (CRR) that utilizes and applies performance data across a broad range of performance metrics.

Desk Monitoring findings and results will determine additional courses of action, including:

1. For those grantees with no significant findings, no further monitoring will take place in the current year. However, as with all grantees, desk monitoring will occur on an annual basis, regardless of compliance or non-compliance.
2. For grantees with minor compliance issues based on the desk review, a DQA by the regional coordinator may be conducted via desk and/or on-site.
3. For grantees with multiple compliance issues based on the desk review and DQA, an on-site monitoring visit will occur to address specific non-compliant areas.

DQAs ensure local programs are administering file checks and reviewing program data for the purpose of technical assistance and improved program performance outcomes. A DQA also ensures the accuracy of data input as well as data integrity, and processes are followed according to NRS and state policy. It allows the program an opportunity to analyze data and check their progress. The second method is On-Site Monitoring visits. Programs which do not meet federal and/or state performance measures or fall in the bottom 20% on the Class Ranking Report are subject to an on-site monitoring visit.

A typical monitoring visit will include the following:

1. Interview the local Administrator/Director, discussing areas of concern, including NRS performance, staffing, budget, and grantee expenditures to date.
2. Discuss the Desk Monitoring Report, Data Quality Audit, NRS Tables, Class Summary Reports, and other forms previously submitted.
3. Interview instructional staff
4. Review pertinent student and class files
5. Financial Reports
6. Closing interviews with all staff to review findings, commendations, and recommendations.

Upon receipt of the final report, the Grantee will:

1. Respond in writing to all findings contained within the Final Report
2. Formulate a Corrective Action Plan (CAP) utilizing the approved West Virginia Adult Education template
3. Request technical assistance

Technical assistance will be available for all low-performing programs, but continued failure to meet minimum state performance measures may result in decreased funding or program cancellation. Any local program or regional coordinator may request an on-site visitation for purposes of program improvement or technical assistance.

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

PERMISSIBLE ACTIVITIES.—Each eligible agency may use funds made available under section 222(a)(2) for 1 or more of the following adult education and literacy activities:

(A) The support of State or regional networks of literacy resource centers.

(B) The development and implementation of technology applications, translation technology, or distance education, including professional development to support the use of instructional technology.

(C) Developing and disseminating curricula, including curricula incorporating the essential components of reading instruction as such components relate to adults.

West Virginia Adult Education provides new instructional staff with extensive CCRS training for English Language Arts and Mathematics. In cooperation with LINCS, a sustainability plan will be developed to continue this effort moving forward.

(D) Developing content and models for integrated education and training and career pathways.

The West Virginia Adult Education Career Pathways Program continues to implement bridge programs offering participants multiple entry and exit points to accommodate academic readiness and employment opportunities based on their Education and Career Plan. These bridge programs have led to entry into postsecondary education and achieving industry-

recognized credentials. The Career Pathways Program collaborates with all core and required partners, numerous additional state agencies, local educational authorities, workforce development boards, community colleges, career and technical education centers, and business and industry. As appropriate, Integrated Education and Training opportunities will be implemented to allow participants to develop their adult education and workplace/workforce related skills while simultaneously training for an in-demand occupation.

(E) The provision of assistance to eligible providers in developing and implementing programs that achieve the objectives of this title and in measuring the progress of those programs in achieving such objectives, including meeting the State adjusted levels of performance described in section 116(b)(3).

West Virginia Adult Education provides technical assistance to aid eligible providers in measuring progress to meet state adjusted levels of performance.

(F) 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.

(G) Integration of literacy and English language instruction with occupational skill training, including promoting linkages with employers.

The professional development team provides resources, training, and professional development to eligible providers for integrating literacy and English language instruction with occupational skill training, and linkages with employers.

(H) Activities to promote workplace adult education and literacy activities.

West Virginia Adult Education partnered with CTE to access the National Occupational Competency Testing Institute (NOCTI) assessments for the purpose of demonstrating workforce employability skills and obtaining industry-recognized credentials.

(I) Identifying curriculum frameworks and aligning rigorous content standards that—

(i) specify what adult learners should know and be able to do in the areas of reading and language arts, mathematics, and English language acquisition; and

(ii) take into consideration the following:

- 1. State adopted academic standards.**
- 2. The current adult skills and literacy assessments used in the State or outlying area.**
- 3. The primary indicators of performance described in section 116.**
- 4. Standards and academic requirements for enrollment in non-remedial, for-credit courses in postsecondary educational institutions or institutions of higher education supported by the State or outlying area.**
- 5. Where appropriate, the content of occupational and industry skill standards widely used by business and industry in the State or outlying area.**

(J) Developing and piloting strategies for improving teacher quality and retention.

All new instructional staff are provided a systematic new teacher training which pairs them with a peer trainer to provide ongoing support for the first year of employment. Ongoing evaluation

of this system allows for continuous improvement in the process. As of July 1, 2019, all new full-time instructional staff lacking a professional teaching certification must complete a state-approved alternative education program which results in a CTE teaching certification with adult education endorsement. West Virginia Adult Education partners with an association to provide instructional staff with low-cost college credit opportunities to maintain their certification.

(K) The development and implementation of programs and services to meet the needs of adult learners with learning disabilities or English language learners, which may include new and promising assessment tools and strategies that are based on scientifically valid research, where appropriate, and identify the needs and capture the gains of such students at the lowest achievement levels.

(L) Outreach to instructors, students, and employers.

West Virginia Adult Education provides outreach via a toll-free hotline number for individuals seeking information about high school equivalency or services in their local area.

(M) Other activities of statewide significance that promote the purpose of this title.

F. ASSESSING QUALITY

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

West Virginia Adult Education strives to focus professional development on the skills that instructors require to address each student’s needs and challenges to help students learn and raise achievements. The quality of professional development provided will be assessed by reviewing various data reports and the student achievement reports available in the state management information system. Student outcomes, achievements, successes, and measurable skill gains will be monitored for each class by regional adult education staff.

All professional development training sessions, online courses, and conferences are evaluated. Presenters and training teams review the evaluations, consider feedback, and adjust as needed. A comprehensive statewide needs assessment is utilized to determine professional development areas of need and/or improvement. Those identified areas are addressed regionally and at the annual West Virginia Adult Education Association, Inc. (WVAEA) statewide conference where guest speakers and selected instructional staff present creative and innovative research-based practices such as the essential components of reading instruction. Providers and instructional staff are encouraged to attend state and national conferences relating to adult education to further enhance their knowledge-base and program. All professional development is tracked via the state management information system, where reports can be generated to identify non-compliance with state mandated requirements.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS

States must provide written and signed certifications that:

The State Plan must include	Include
1. The plan is submitted by the State agency that is eligible to submit the plan;	Yes

The State Plan must include	Include
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 assurances that:

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

AUTHORIZING OR CERTIFYING REPRESENTATIVE

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

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

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

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

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

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

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

Please download and sign the forms below. Please scan and return the forms to wioa@ed.gov at the same time you submit your State Plan via the portal.

1. SF424B - Assurances – Non-Construction Programs
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)
2. Grants.gov - Certification Regarding Lobbying
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)
3. SF LLL Form – Disclosure of Lobbying Activities (required, only if applicable)
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)

APPLICANT'S ORGANIZATION

Applicant's Organization

Enter information in this columnWest Virginia Department of
Education**PRINTED NAME AND TITLE OF AUTHORIZED
REPRESENTATIVE**

First Name

W. Clayton

Last Name

Burch

Title

State Superintendent of Schools

Email

wburch@k12.wv.us

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

Describe the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs provide the information to meet the requirements of Section 427 of the General Education Provisions Act (GEPA), consistent with the following instructions posted at <https://www2.ed.gov/fund/grant/apply/appforms/gepa427.doc>.

West Virginia Adult Education programs provide equal access to services without regard to race, color, creed, religion, national origin, sex, age, marital status, disability or sexual orientation. It does not discriminate in admission to its programs, services or activities; in access to them; in treatment of individuals with disabilities; or any aspect of their operations.

Upon employment, instructors are provided face-to-face professional development pre-service sessions related to discrimination and disability accommodations. They also are responsible for assignments in Schoology geared toward these topics.

All students are required to follow a *Code of Conduct* and *Dress Code* which explains the expectations regarding appropriate behavior, attendance, progress, and dress code. This provides a starting point for a stable safe environment for all students. No violence or abuse of any kind is tolerated within the program classroom.

Materials available for students with disabilities include Braille TABE, Large Print TABE, Audio TABE, Large Print CASAS and a talking calculator. Materials available for ELL students include Spanish TRA and additional curriculum.

West Virginia Adult Education is prepared to provide an interpreter for those students who are hearing impaired. This is through a partnership with the West Virginia Division of Rehabilitation Services. Interpreters are contracted on an as needed basis.

Distance Education opportunities for ELL students as well as literacy level students includes Burlington English software. This online courseware can be accessed outside of an adult education classroom as an additional learning resource.

West Virginia Adult Education has access to multiple literacy programs located across the state who can provide trained volunteers to work with low level literacy individuals. Some programs provide both ESL and basic literacy services.

Recruitment of students into programs includes PSAs to local television, radio, newspaper outlets, and social media. This ensures that students with limited reading skills can hear about

the program. The public has access to the West Virginia Department of Education website which is ADA compliant.

All class locations are considered diverse learning centers. All students are connected by interest and need rather than limited by gender, age, race, sexual orientation or culture.

West Virginia Adult Education monitors local program compliance using our on-site instrument to ensure that all individuals regardless of gender, race, national origin, color, disability, or age are receiving appropriate services. Program intake forms are designed to identify barriers which may exist in order for the local program to assist with equal access to services. Additionally, the West Virginia Adult Education management information system collects student demographic information which is used by the state to monitor program compliance. Further, the on-site monitoring tool includes a financial review to monitor compliance with applicable county, state, and federal policies.

West Virginia Adult Education On-site Monitoring Coordinator and West Virginia Adult Education ADA Compliance Coordinator monitor local program compliance and, where necessary, issue a formal corrective action plan to ensure equal access to services as required by law.

ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

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

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

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

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

- Measurable Skill Gains

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

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

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

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

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

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

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

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

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each

of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2022	PY 2022	PY 2023	PY 2023
	Expected Level	Negotiated Level	Expected Level	Negotiated Level

Employment (Second Quarter After Exit)

Employment (Fourth Quarter After Exit)

Median Earnings (Second Quarter After Exit)

Credential Attainment Rate

Measurable Skill Gains

Effectiveness in Serving Employers Not Applicable ¹ Not Applicable ¹ Not Applicable ¹ Not Applicable ¹

¹

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION (COMBINED OR GENERAL)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan [13] must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA:

[13] Sec. 102(b)(2)(D)(iii) of WIOA

A. INPUT OF STATE REHABILITATION COUNCIL

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. INPUT PROVIDED BY THE STATE REHABILITATION COUNCIL, INCLUDING INPUT AND RECOMMENDATIONS ON THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, RECOMMENDATIONS FROM THE COUNCIL'S REPORT, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION, AND OTHER COUNCIL REPORTS THAT MAY HAVE BEEN DEVELOPED AS PART OF THE COUNCIL'S FUNCTIONS;

The West Virginia Division of Rehabilitation Services (DRS) received input from the West Virginia State Rehabilitation Council (SRC) members and chairperson regarding the Unified State Plan to be submitted by the Workforce Innovation and Opportunity Act (WIOA) partners in 2020. The input and the agency responses are reported below.

Observation 1: The partnership between DRS and the Department of Education is imperative for the successful Pre-Employment Transition Services (Pre-ETS) of high school students evolving

into the workforce. To reinforce this partnership, there is a profound need for preserving open communication. This will assure students are referred to vocational rehabilitation at a younger age and have a more informed understanding of community-based services offered by WV DRS.

Recommendation: The SRC recommends this component be continued to strengthen knowledge of policies, referral processes, as well as, emerging trends and practices on an annual basis.

Observation 2: A priority for Vocational Rehabilitation is reaching students during their secondary education (9th – 12th grades.) This is imperative for our youth as they start early in identifying their career paths. The creation of an Individual Plan for Employment (IPE) early to outline a student's vocational goal area and necessary services needed to support this goal is important. This provides a direction for a student's success when transitioning from high school to the next phase of life whether continuing their education or entering the workforce. The agency has VR counselors assigned to all secondary schools in West Virginia with offices physically located in several high schools in West Virginia.

Once students are preparing to leave the secondary school system and move forward into higher education, the students, their parents and advisors/counselors may not be fully aware of services available through DRS. Placing Pathways banners at all West Virginia high schools has helped to increase awareness of available transition resources for students.

Recommendation: The SRC recommends that DRS continue working with high schools and/or vocational schools to establish VR offices to be physically located on additional campuses of our schools. DRS will continue to improve outreach and access to services for children in non-traditional educational settings. This would provide access to VR counselors for assistance to those students and their families to secure services at an earlier age, as funding allows.

Observation 3: The Council is very impressed with the success of the Career Exploration Opportunities (CEO) Program for youth between the ages of 14 and 21 that was conducted throughout West Virginia during the summer of 2019. Based on the Pre-ETS concept, the summer program provided students with the tools and information in seeking long-term career success. The program provided Job Exploration Counseling, Workplace Readiness Training, Counseling on Postsecondary Education Opportunities, and Instruction in Self-Advocacy. Vendors provided and/or completed all training materials, space, training, participant pre- and post-assessments, attendance logs, and summary report at completion.

Recommendation: The SRC recommends the CEO Program be continued, as funds allow, to provide transitioning students with the opportunity to become educated and experience their career paths. This will also provide DRS additional resources while developing relationships and growing referral networks with employers throughout the State.

Observation 4: Identifying Community Rehabilitation Programs (CRPs) and other service providers who can optimize an individual's independence and provide support in helping someone maximize their employment opportunities is a valuable resource. These programs can help individuals achieve their employment goals, aid in career choices & advancements and help in overcoming obstacles.

Recommendation: The SRC recommends DRS assure current lists of CRPs and service providers are available for students and/or their supports to make an informed, individual choice to aid them in future planning be available on the Agency website, from school counselors or VR counselors.

Observation 5: Integrating and coordinating with WIOA partners in the Workforce Development System is a priority to achieve unified goals. The Agency participates and organizes meetings and events to demonstrate a common mission and vision between partners to increase opportunities for employment for people with disabilities.

Recommendation: The SRC recommends continuing to participate in the joint functions and provide educational and networking opportunities whenever the occasion arises. Disseminating brochures, signage and/or informational materials is suggested.

Observation 6: Business owners and managers are continually seeking employees who want to work; however, businesses may not know how to remove barriers. In many instances, businesses are not aware of the technical assistance, ADA training, on the job accommodations, supported employment options and financial benefits that might be available through the Workforce Development System.

Recommendation: The SRC recommends educating businesses on the advantages their company may experience having hired a person with a disability is the foremost important detail when considering hiring a person. Conducting workshops, having powerpoint/video presentations, disseminating quality brochures and resource guides for a company's management & staff is paramount. Creating an email blast for a concise one- or two-page monthly newsletter for West Virginia businesses, highlighting success stories, training incentives and recognizing businesses who have hired or been long time supporters for hiring people with disabilities is an effective tool to market DRS.

Observation 7: Educating the general public regarding the DRS to ensure knowledge and the continuum of agency services and programs is crucial. The agency utilizes their website, newspaper articles, statewide magazine advertisements, community events, social media and public broadcasting to bolster awareness of DRS in all areas of the state.

Recommendation: The SRC recommends this practice be continued with an emphasis directed to our underserved areas of the State.

Observation 8: West Virginia's demographics and cultural backgrounds can be challenging; therefore, communication must be innovative. Finding the most efficient avenue to educate students and their families regarding available DRS services and programs is an ongoing obstacle. Effective, beneficial communication is a key factor.

Recommendation: The SRC recommends that DRS:

- continue to keep students and their families informed about services and programs offered by the agency using more social media and community transition events and
- increase the visibility and access of VR staff assigned to their respective schools by making school presentations, using VR displays, exhibiting posters in prominent locations and having an increased presence at Individual Education Plans (IEPs) and other transition planning meetings.

Observation 9: The agency expects an influx of youth who have drug and/or alcohol related issues and will need services in the future. The agency is not only concerned about the youth having substance related disorders of their own, but also the long-term effects of prenatal opiate exposure. This will be an area that will require VR staff to have more diverse training in these specialized programs and skill sets.

Recommendation: The SRC recommends that the Agency continues to provide staff with the training and technical assistance needed to expand their knowledge of drug addiction related diseases and adverse childhood experiences that will affect transition services (ACES.)

Observation 10: The national trend focusing on working more closely with disabled individuals who are within the corrections system, DRS has implemented a position for a Behavioral Health and Corrections Specialist. The focus will be on individuals with mental illness and/or other cognitive disabilities.

Recommendation: The SRC recommends that the Agency continue to strengthen and expand relationships with the Behavioral Health and Corrections communities for individuals with disabilities who are served in the correctional system.

Observation 11: Transportation issues are persistent not only in West Virginia, but nationally. The lack of personal and public transportation in many areas of West Virginia continues to be an ongoing challenge. DRS offers varying opportunities for instruction in learning to drive when barriers are present. All West Virginia high schools currently offer their students driver's education classes. For adults who have lost their driver's license, regaining them may be difficult due to the law and their ability to reimburse the system the required fees.

Recommendation: Individual Plans for Employment (IPEs) should include driver's education assessments for students with disabilities who may require accommodations in order to drive. This may require:

- occupational, developmental visual evaluations;
- driver education instructors in the state being supplied with the information available outlining the agency's driving program that offers technical and adaptive support or training; and,
- ensuring DRS counseling staff are knowledgeable of advocacy resources available to individuals who need assistance in regaining provisional licenses for driving privileges and continuing to provide transportation assistance when necessary for employment purposes.

Observation 12: As funding allowed, DRS has conducted VR State Conferences. Speakers from a myriad of areas have been brought to these conferences to expand knowledge, update staff on new regulations, changes in the law, motivate employees and bring new creative ideas for program and service delivery. These conferences also provided the opportunity for the VR staff from throughout the state to spend several days sharing experiences, hearing state and national issues, talking with guest speakers while networking with administrative staff and their peers to have a better understanding of Agency workings.

Recommendation: The Council encourages promoting team building and giving the opportunity for an educational experience to enhance job performances. This is vital to the continuing success of the Agency and enriching staff. The Agency Quality Assurance (QA) professionals should keep staff well advised of ongoing emerging practices, policy changes and trends in the respective districts. Partnering with other agencies for joint conferences will also strengthen VR best practices.

CONSUMER SATISFACTION

As part of its program improvement efforts, DRS continues to support the implementation of consumer satisfaction surveys of its clients to ensure quality services for DRS consumers. The

SRC conducts the consumer satisfaction surveys (with full DRS assistance and cooperation). The SRC is primarily responsible for completion of the consumer satisfaction survey for VR consumers. DRS continues to provide and supplement fiscal and human resources needed for its successful completion.

SRC members selected a survey method that allows former DRS clients and individuals who were not accepted for VR services to be contacted via mail surveys as soon as they exit DRS from various VR statuses throughout the fiscal year. Selected highlights of the 2019 Consumer Satisfaction Survey of DRS Clients as reported by SRC are presented below.

The latest consumer satisfaction report, entitled, Consumer Satisfaction: Report of Survey Findings, was prepared by the SRC in December 2019. The findings were based on consumer satisfaction information gathered from 150 responses across the six DRS districts. Respondents to the consumer satisfaction survey were asked to rate their agreement with statements about their interactions with DRS. The ratings were "strongly agree," "agree," "neutral," "disagree," and "strongly disagree." Respondents were provided an option to indicate replies that were neutral or that the survey item was not applicable.

Responses for the 2019 survey, overall, are slightly higher than the reported satisfaction in previous years. The mean rating across the ten satisfaction items is 80% for 2019 versus 78% mean rating for 2018 and 76% for 2017.

The data generally show that those whose cases are closed as "unsuccessful" (i.e., closed without an employment outcome) are less likely to report high levels of satisfaction with the services they received. This year, while that pattern held, the observed differences were slightly less extreme than in previous years. This year, the mean rating for the "successful" group (i.e., closed with employment) was 96% versus a mean rating of 65% for the "unsuccessful" group.

Major findings of the consumer satisfaction survey include: respondents felt that their rehabilitation counselor treated them with respect (78%), their questions were answered clearly by DRS (83%), they were involved in their plan development (74%), their counselor stayed in contact so they knew what was happening (79%), and they received the services they needed (72%). Respondents also reported that they knew what each step of their IPE would be (85%) and their counselors told them about job opportunities (89%). Consumers also reported high ratings for accessibility of local offices (89% gave an "Above Average" or "Excellent" rating), their counselors (83%), and the overall experience with DRS (79%).

The consumers were asked to recall which client's rights information had been explained to them. There were 121 individuals who responded that at least one right had been explained (81% of the sample). Most individuals indicated that they had received several rights explanations. The most commonly explained rights to consumers were (1) their participation in developing the rehabilitation plan (92%) and (2) choice of how services were provided (74%). When asked about needs that were not met by rehabilitation services, 64 of the 113 consumers who responded to this question reported that they had no additional needs (57%). Consumers who did report additional needs most commonly requested education/training, employment-related services, medical services, and financial services.

The survey participants were asked for comments on their experience with DRS. A total of 69 people provided feedback to this question. Of these, 29 expressed praise or gratitude for DRS services, 19 made other statements of explanation or inquiry, and 21 offered criticism. Overall, the level of satisfaction reported for the period continues to be high, as the overall satisfaction increased from 78% to 80%. To maintain high quality of services and promote a greater

satisfaction level for our consumers, DRS welcomes and considers compliments, complaints, suggestions, and recommendations that our clients reported in the consumer satisfaction survey.

The SRC and DRS were also interested in examining the pattern of responses for transitioning youth (clients who were age 24 or younger). Youth surveys were color-coded so the participants could be isolated. Their responses formed a subset of 78 returned surveys. Overall, youth satisfaction was equivalent to the responses of the whole group, at 80%. Transitioning youth respondents felt that their rehabilitation counselor treated them with respect (79%), their questions were answered clearly by DRS (78%), their counselor stayed in contact so they knew what was happening (76%), and they received the services they needed (73%). Youth respondents also reported that they knew what each step of their IPE would be (86%), DRS counselors helped them develop a plan to get a job (75%), and their counselors told them about job opportunities (90%). Transitioning youth also reported high ratings for accessibility of local offices (90% gave an "Above Average" or "Excellent" rating), their counselors (84%), and the overall experience with DRS (81%).

STRATEGIC PLANNING

Strategic planning discussions occur on a monthly basis at DRS Executive Management Group meetings, which include representatives of the SRC and Statewide Independent Living Council (SILC). Needs assessment results are shared with the SRC and SILC. DRS Goals and Priorities were presented at meetings of the SRC, where the SRC has opportunities for input. The SRC meetings include a variety of stakeholders, including representatives from the Client Assistance Program, SILC, and other state agencies

In January 2020, DRS held public "Q and A" Sessions in Morgantown and Charleston to receive comments and questions from VR stakeholders pertaining to the Vocational Rehabilitation section of the 2020 Unified State Plan. There were a total of 14 attendees at the sessions. Several questions and comments were posed during the meetings. These included questions regarding outreach and marketing efforts by DRS and how DRS is serving high school students with disabilities under WIOA.

To ensure transparency and public awareness regarding the Program Year (PY) 2020 VR section of the Unified State Plan, DRS posted a draft version on the agency's website for review.

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

DRS Response to Observation/Recommendation 1:

DRS agrees that its partnership with the West Virginia Department of Education (WVDE) is vital to the success of the provision of Pre-ETS to high school students with disabilities. In Program Year (PY) 2019, DRS hosted a joint conference with the Office of Special Education within WVDE which was attended by both DRS counselors and Special Education Staff and Teachers statewide. DRS anticipates similar conferences in the future. Special Education Teachers have also been trained to use the Pathways to the Future website with their students, as well as instructional materials regarding Pre-ETS to be used in the classroom. Additionally, because a DRS counselor is assigned to every West Virginia high school, DRS counselors are in frequent communication with teachers, students, and other educational staff.

DRS Response to Observation/Recommendation 2:

DRS agrees that it is important for transitioning youth (TY) with disabilities to begin the vocational rehabilitation process as early as appropriate. DRS is open to the recommendation and has requested that counselors identify any possible opportunities for embedded VR offices within high schools. Relatedly, the West Virginia School for the Blind has made a request, to which DRS has agreed, to have on-campus DRS counseling staff available to provide services, including Pre-ETS, in an expeditious manner. If additional opportunities arise, DRS will move forward to establish offices, where appropriate and agreed upon by both parties.

In support of this aim, DRS currently has 59 vocational rehabilitation counselors assigned to serve TY, including a counselor assigned to each high school in the state. Nineteen counselors are assigned exclusively to TY territories, allowing for more time and resources to provide outreach and services, particularly Pre-ETS to high school students. These counselors are also beginning outreach to students in the ninth grade to ensure sufficient time to provide Pre-ETS and develop and implement a plan for the student's transition from high school to post-secondary employment or training.

Additionally, DRS has made concerted efforts to provide outreach and services to non-traditional education settings for youth with disabilities, such as juvenile centers and facilities, Youth Reporting Centers, and other similar locations. The youth in these settings are afforded the same opportunity to receive Pre-ETS and other VR services as individuals in traditional settings, as appropriate.

DRS Response to Observation/Recommendation 3:

DRS agrees that the CEO Summit program should be continued, as funds allow. In 2019, DRS sponsored numerous Summit events, utilizing the assistance of local CRPs. This allowed a greater number of students to be reached by the program and have content presented that was more geographically relevant. DRS hopes to continue to implement CRP efforts in the future to continue the CEO Summits that provide a tremendous benefit to West Virginia's students with disabilities.

DRS Response to Observation/Recommendation 4:

DRS agrees that CRPs are a valuable resource to consumers with disabilities in pursuit of their employment goals. As such, DRS makes consistent efforts to maintain and improve relationships with CRPs, including maintenance of an up-to-date listing of all CRPs providing each of the acknowledged CRP services. In doing so, DRS counselors are better able to inform consumers of the CRP services that are available to them in their geographic area. Additionally, CRP information can be found on the Pathways to the Future website (www.pathwayswv.org), under the Employers tab.

DRS Response to Observation/Recommendation 5:

DRS agrees that integration and coordination with WIOA partners WorkForce West Virginia and West Virginia Adult Education is highly important. Since the implementation of WIOA, DRS has worked diligently to coordinate its efforts with its WIOA core partners in order to more effectively and efficiently serve the workforce of the state, including employers and job seekers, especially those with disabilities. At the state level, DRS representatives meet with WIOA partners on a monthly basis. Additionally, many DRS staff are co-located with other WIOA partners at American Job Centers to facilitate services to its customers, including individuals with disabilities. DRS will continue, as appropriate, to disseminate information to its WIOA partners to inform them of events, best practices, and other relevant information, in the most accessible means available.

DRS Employment Specialists continuously collect employment information from their business contacts. This information, including job orders for open positions, is immediately input into the WorkForce West Virginia's online Mid Atlantic Career Consortium (MACC) system and shared within the Workforce Development System (WDS).

DRS will continue to serve on Business Service Teams with WorkForce West Virginia, Adult Education, local workforce development boards, and other related entities. Through training and standardizing informational materials, when possible, these team members, including DRS Employment Specialists, provide a full range of WDS information when making visits to employers. This will allow the WDS to maximize the impact of employer visits and ensure that businesses are aware of all resources available through the WDS.

DRS Response to Observation/Recommendation 6:

DRS agrees that educating businesses and employers, including their management, is an important step toward competitive, integrated employment for individuals with disabilities. True to this idea, DRS has an in-house Employer Services Section that specializes in providing employers with disability-related information, services, and pre-screened job seekers. The DRS Employer Services Section has 9 Employment Specialists that cover all 55 counties in West Virginia. DRS' team of Employment Specialists provide business owners and employers with critical business options and assistance in staffing, employee retention strategies, education on disability-related issues, job accommodations, and information about financial incentives for employers who hire individuals with disabilities. DRS will continue to utilize these Employment Specialists to promote the connection of employers to job seekers with disabilities. DRS will consider the use of newsletters to businesses, highlighting success stories and training incentives in order to increase employers' awareness.

DRS Response to Observation/Recommendation 7:

DRS agrees with the recommendation to continue efforts to inform the general public about the availability of DRS services. In recent years, the agency has focused on reaching out to stakeholders of vocational rehabilitation (VR) services, including potentially underserved/unserved consumers with disabilities from minority backgrounds. DRS utilizes the latest technology for this purpose, including a web map that includes turn-by-turn directions to each office to help potential consumers more easily find DRS field offices. As a result, DRS has maintained a constituency that is similarly proportioned to the state as a whole regarding race and ethnicity and is well represented by individuals with disabilities from minority backgrounds.

Additional activities include the sponsoring of community events and statewide radio advertisements. DRS plans to continue to identify effective ways to reach out to consumers with disabilities, including potentially underserved/unserved populations using various methods. Additionally, with the ongoing implementation of WIOA, an additional focus for DRS is to reach out to high school students, including their parents and service providers in the community.

DRS Response to Observation/Recommendation 8:

DRS agrees that effective, good communication is a key factor in making sure that students and their families are aware of DRS services and programs that are available for eligible individuals as they begin preparing for post-secondary school goals. DRS engages in a variety of outreach activities to ensure widespread information dissemination that is beneficial for students with disabilities preparing to leave the school setting. These activities include sponsoring community events, attending job fairs, passing out brochures, and speaking to classrooms.

Additionally, the agency has a counselor assigned to each high school in West Virginia as well as liaisons assigned to institutions of higher education around the state. This on-site presence assists the agency in developing and maintaining working relationships, on a personal level, with students and school staff. Counselors provide outreach materials, including a specialized brochure for transition students. The brochure highlights the DRS Transition program, including eligibility requirements and available services. The brochure has the agency's website address where additional information about the DRS Transition program is available. DRS will continue to explore new, effective methods of information dissemination to secondary schools and institutions of higher education.

In the agency's effort to educate parents, DRS utilizes West Virginia Parent Training and Information, Inc (WVPTI). The WVPTI is the only organization in West Virginia charged by the U.S. Department of Education/Office of Special Education Programs to serve as the state's Parent Training and Information Center. As mandated in the Individuals with Disabilities Education Act, the WVPTI provides parents of children with disabilities with the information and skills necessary to become effective partners in their children's provisions for special education and related services, including vocational rehabilitation services provided by DRS.

Furthermore, DRS will continue to consult with state and local education officials regarding the use of newsletters and registration packets to inform students and their families about DRS services. DRS counselors and special education teachers across the state also emphasize the use of the Pathways to the Future website to students with disabilities. Many high schools have banner displays promoting the use of the website as well. Finally, DRS counselors attend IEP and other transition planning meetings when they are invited and will continue to do so, in accordance with the law.

DRS Response to Observation/Recommendation 9:

DRS agrees with the issues raised by the SRC regarding the potential increase in the number of consumers having drug and/or alcohol related issues. In addition to the implementation of a Behavioral Health and Correction Specialist at the state level, DRS has been proactive in this area in recent years by providing training to counselors. Training has occurred at the State Training Conference in the past and will continue to take place at future conferences, as appropriate. This training will assist counselors in enhancing their service provision to individuals with addiction by providing an overview of the disease of addiction and an examination of historic, current, and future treatment modalities.

DRS Response to Observation/Recommendation 10:

DRS agrees with the SRC about the importance of working with organizations and individuals with behavioral health issues and previous incarcerations, including individuals in juvenile detention programs. As mentioned, the agency has implemented a Behavioral Health and Corrections Specialist to focus on outreach and comprehensive service provision to these individuals. The specialist will maintain working relationships with related national and state organizations, assist in the training of counselors in these specialized areas, and ensure that the agency is providing quality and timely services to these individuals.

DRS Response to Observation/Recommendation 11:

DRS agrees that driving and transportation in general are often a barrier to employment for West Virginians with disabilities of all ages. DRS continues to seek solutions to transportation issues and maintains this as an agency goal and priority. During the initial phase of the vocational rehabilitation process, DRS counselors discuss transportation-related issues with

consumers. Counselors work with consumers to address and resolve any identified disability-related employment barriers; services to circumvent barriers are included in Individualized Plans for Employment and may include transportation services. DRS also emphasizes individualized transportation services, including driver training, bioptic training, vehicle modification, and vehicle purchase, when necessary. DRS agrees that counselors need to stay abreast of resources available to consumers with disabilities regarding obtaining a driver's license in order to best meet their needs for employment-necessary transportation.

DRS Response to Observation/Recommendation 12:

DRS agrees that training conferences are extremely valuable for agency staff members. In the past, these conferences have provided expert speakers, training sessions, and networking opportunities for field staff from across the state. Additionally, it is an enriching experience for staff members to meet others from across the state. The conference promotes cohesiveness among VR staff, as well as promoting team building, in order to serve consumers with disabilities statewide. In PY 2019, DRS and WVDE held a joint conference, bringing DRS counselors and special education teachers across the state together. DRS intends to continue conferences of this nature in the future.

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

The agency is in agreement with the input and recommendations provided by the SRC. Please see the previous section for the full DRS responses to the SRC input and recommendations.

B. REQUEST FOR WAIVER OF STATEWIDENESS

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

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

This agency has not requested a waiver of statewideness

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

This agency has not requested 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.

This agency has not requested a waiver of statewideness

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

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

The West Virginia Division of Rehabilitation Services (DRS) maintains cooperation and coordination with various agencies and entities. This section describes DRS association with agencies or entities that are not in the statewide workforce development system, education officials, private non-profit vocational rehabilitation service providers, and supported employment and extended services providers for individuals with the most significant disabilities.

DRS continues to maintain strong relationships with many agencies and organizations that are not in the statewide workforce development system and whose functions, in some capacity, involve the provision of services to individuals with disabilities. The association with other organizations occurs with varying degrees of involvement depending upon joint initiatives that may be planned and/or that may occur within any given year. Generally, DRS representatives may be included in advisory functions for other agencies, as are other agencies with the strategic planning that occurs within DRS. Some examples include:

- A DRS representative is actively involved with the West Virginia Behavioral Health Planning Council in the monitoring and oversight of behavioral health services in the state. The DRS representative participates in quarterly Council meetings and serves on various subcommittees.
- DRS representatives participate with the West Virginia Developmental Disabilities Council. DRS maintains a close working relationship with the staff and members of this Council and has provided support and received effective feedback for its work.
- DRS is represented on the State's Interagency Collaborative Team (ICT), a group (including agencies not under the state workforce development system) centered around WorkForce West Virginia to provide ongoing attention to addressing issues that will build and continually improve the statewide Workforce Development System (WDS). The team is the single State-level interagency group for addressing issues or concerns regarding building and maintaining the most effective and efficient implementation of the overall WDS in West Virginia. DRS participates in and hosts regular monthly meetings of the ICT, and is one of the signatories of the ICT Memorandum of Understanding, which is drafted annually. The ICT membership includes:
 - Department of Commerce – WorkForce West Virginia
 - Department of Commerce – Division of Rehabilitation Services
 - Department of Commerce – Development Office – Community Development Division
 - Department of Commerce – Development Office – Business Industry Development
 - Bureau of Senior Services – State Unit on Aging
 - Council for Community and Technical College Education
 - Department of Education – Office of Adult Education and Workforce Development
 - Department of Education – Office of Diversion and Transition Programs
 - Department of Health and Human Resources – Bureau of Children and Families,
 - Department of Health and Human Resources – Temporary Assistance for Needy Families
 - Department of Health and Human Resources – Food Stamp Employment and Training, United States Department of Agriculture

- DRS has a good working relationship with the Department of Veterans Affairs (VA) at the district level, which allows direct referrals of appropriate veterans from VA facilities to its rehabilitation technology unit for assistive technology and rehabilitation engineering services. Furthermore, DRS maintains liaisons for all VA offices in WV.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

With respect to state programs carried out under section 4 of the Assistive Technology Act of 1998, DRS has a memorandum of understanding (MOU) with the West Virginia Assistive Technology System (WVATS) of the West Virginia University Center for Excellence in Disabilities (CED). The purpose of this MOU is to delineate the working relationship between DRS and the CED in order to provide effective services to individuals with disabilities and their families, ensuring statewide coverage of assistive technology needs.

CED provides free services, statewide, to individuals of all ages and abilities. Device demonstrations are available, in the CED office and in the community, for individuals to receive hands-on guidance from knowledgeable CED staff. Device loans are also available to allow individuals to try-out a device before purchasing or to use during a short-term disability (up to 30 days). CED provides technical assistance to government agencies, institutes of higher education, industry, and other entities. This technical assistance includes consultation on assistive technology (AT) related programs and service design. When appropriate, CED provides information and referrals to ensure individuals are connected with available resources relating to disability needs, AT devices, and funding options.

CED also provides professional development and group training around the state. These trainings are customized to increase knowledge, skills, and competencies in AT devices and service delivery. Popular training topics include:

- Creating accessible documents
- Creating accessible PowerPoint presentations
- AT and transition
- Switch access basics
- iPads as AT
- AT for recreation
- AT for aging

CED WVATS activities are overseen by a Consumer Advisory Council, of which a DRS representative is a member. Similarly, the CED is represented on the West Virginia State Rehabilitation Council, which works closely with DRS to help ensure that all West Virginians with disabilities are provided with an equal opportunity to receive the vocational rehabilitation (VR) service(s) for which they are eligible.

The CED also receives partial funding from DRS in exchange for direct services to eligible individuals in need of AT that is unavailable directly from DRS. DRS has an AT unit, which provides AT solutions to eligible individuals with AT needs statewide. With the additional assistance of the CED, assurances are made that high-quality AT solutions can be provided statewide at any time. Additionally, both parties agree to consult with each other on an as-needed basis for atypical cases.

Individuals and families receiving AT services at the CED who are 14 years of age or older will also receive information on the eligibility requirements for DRS and the vocational rehabilitation services they provide. If an eligible individual in the VR system requests AT services from the CED, DRS staff will make the proper referral. DRS will also refer eligible individuals to the CED in the event that DRS is unable to provide, through their AT unit, the necessary AT.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

Although DRS does not maintain a formal agreement with the U.S. Department of Agriculture (USDA) through the office of the Under Secretary for Rural Development, it provides rehabilitation services as necessary to eligible migrant and seasonal farm workers with disabilities. Another available resource is the West Virginia AgrAbility Project, a USDA-funded program established to assist farmers and farm families who need to find ways to accommodate their disabilities in order to remain active in agriculture.

DRS shares the vision of West Virginia AgrAbility to enhance quality of life for farmers, ranchers, and other agricultural workers with disabilities, so that they, their families, and their communities continue to succeed in rural America. More specifically, "success" may include: gainful employment in production agriculture or a related occupation; access to appropriate assistive technology needed for work and daily living activities; evidence-based information related to the treatment and rehabilitation of disabling conditions; and targeted support for family caregivers of West Virginia AgrAbility customers. West Virginia AgrAbility addresses a wide variety of disabling conditions in agriculture, including, but not limited to:

- Arthritis
- Spinal cord injuries/paralysis
- Back impairments
- Amputations
- Brain injury
- Visual impairments
- Hearing impairments
- Disabling diseases
- Cerebral palsy
- Respiratory impairments
- Head injury

West Virginia AgrAbility continues to work with DRS in advocating for services for West Virginia farmers. West Virginia AgrAbility also provides training for allied health professionals on farm culture, how to tailor treatments to the farmer, and using assistive technology on the farm for Vocational Rehabilitation Counselors, Physical Therapists, and Occupational Therapists. West Virginia AgrAbility continues advocacy efforts with DRS, positively impacting DRS' view on agriculture in West Virginia as a viable self-employment option.

If a West Virginia AgrAbility participant becomes a DRS consumer, they may receive vocational rehabilitation services to help them reach their employment goal. Services may include:

- Evaluation and assistance in purchasing recommended adaptive devices
- Assistive technology
- Rehabilitation technology
- Home, business and/or vehicle modification
- Assistance for vocational training
- Physical or mental health restoration
- Self-employment and business-related services, if applicable

4. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

DRS works with a variety of non-educational agencies serving out-of-school youth. The primary coordinated activities serving this population are with WIOA partners – WorkForce West Virginia and the regional workforce development boards. DRS strives to coordinate referrals and services to eligible out-of-school youth served by the WIOA youth programs that are overseen by WorkForce West Virginia and the local workforce development boards. These partnerships allow for improved service delivery through the blending of resources and expertise among the agencies. For example, sharing costs allows DRS and other agencies to enhance outreach efforts, serve increased numbers of out-of-school youth, and improve outcomes for participants.

In addition to DRS' reliance on WIOA partners in serving out-of-school youth, the agency continues to use community rehabilitation programs (CRPs) that have become a DRS-acknowledged vendor, to support the needs of this population across the state.

DRS also maintains communication and works with other non-educational agencies that serve out-of-school youth in order to introduce and provide VR services. These agencies include Youth Reporting Centers under the West Virginia Division of Juvenile Services and Peer Support Centers, funded by the West Virginia Bureau for Behavioral Health. Youth Reporting Centers are community-based centers that provide intervention programs for at-risk youth and also provide reintegration services for youth returning to the community. The Peer Support Centers provide a variety of support services for qualifying youth with behavioral health conditions.

5. STATE USE CONTRACTING PROGRAMS.

West Virginia's State Use Program was created by the legislature in 1984 and strengthened in 1989. The program allows employment opportunities to be created for citizens with disabilities through nonprofit Community Rehabilitation Programs. The State Use law allows these programs and their clients to produce commodities and perform services for various state agencies without requiring competitive bidding. Prices charged for these special commodities and services are established by the Committee for the Purchase of Commodities and Services from the Handicapped.

The Committee consists of six members appointed by the Governor with the advice and consent of the Senate. One member is selected by the Governor to serve as chairperson. Members represent the following:

- a private citizen who is conversant with the problems incidental to the employment of persons with disabilities,
- a representative of a producing nonprofit workshop,

- a representative of the Division of Rehabilitation Services,
- a representative of the Department of Administration who is knowledgeable in the purchasing requirements of the state,
- a representative of private business who is knowledgeable in the activities involved in the sale of commodities or services to governmental entities, and
- a representative of organized labor who is knowledgeable in matters relating to employment of people with disabilities.

Members serve two-year terms. There is also an ex-officio, non-voting member of the committee who is appointed by the Director of the Purchasing Division. This person serves as the Executive Secretary. There are no geographical or political party constraints on who may be appointed.

The state network of CRPs is critical to the effective and efficient delivery of vocational rehabilitation services to individuals with significant disabilities. As of October 2019, there are 72 DRS-acknowledged parent company CRPs in West Virginia located at 80 service sites. Many of these CRPs participate in state use contracting programs. DRS maintains working relationships with non-profit CRPs in West Virginia that provide supported and direct employment, community-based assessment, and/or work skills assessment. CRPs also provide employment readiness services such as life skills and work adjustment, job site training, and trial work experience. While respecting freedom of choice, DRS encourages work center programs to expand community-based programs for these individuals. Any CRP meeting the DRS acknowledgment process will be permitted under a written Vendor Acknowledgement to bill for services provided to DRS consumers. In order to become a DRS-acknowledged vendor, an applicant must request, complete, and return a Vendor Acknowledgement Packet. Upon receipt of the completed packet, a recommendation to acknowledge or not acknowledge will be made to the DRS Director.

The Vendor Acknowledgement Packet contains an application for Vendor Acknowledgement to provide supported employment services, an annual data summary that provides the agency's name, address, contact information, a checklist of those DRS services they will be providing, and a Vendor Acknowledgement form addressing conditions of and payment for services rendered to DRS consumers.

A signed Vendor Acknowledgement indicates that the vendor agrees to follow conditions set forth regarding standards, anti-discrimination, indemnification, and conditions/standards of operation. The acknowledgement is good for three years.

D. COORDINATION WITH EDUCATION OFFICIALS

Describe:

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 West Virginia Division of Rehabilitation Services (DRS) has cooperative agreements with the West Virginia Department of Education (WVDE) Office of Special Education, the WVDE Division

of Technical and Adult Education, Office of Adult Education and Workforce Development, local education agencies (county boards of education), and the West Virginia Schools for the Deaf and the Blind. The current cooperative agreement between DRS and WVDE (the state education agency) went into effect on July 17, 2019. The cooperative agreements between DRS and WVDE, both at the state and the local levels, assure that each student with a disability in the state who needs special education, vocational education, and/or vocational rehabilitation services is identified and that the appropriate services, including pre-employment transition services (Pre-ETS), are made available to the individual. The cooperative agreements cover:

- Determination of agency responsibility;
- Transition and Pre-ETS planning;
- Outreach and identification;
- Financial responsibility of education;
- Financial responsibility of rehabilitation;
- Consultation and technical assistance;
- Confidentiality of information/sharing of information;
- The duration of the agreement;
- Local agreements;
- Dispute resolution;
- Modification of the agreement; and
- Subminimum wage employment.

The following excerpt from the current formal agreement between DRS and WVDE outlines the coordination and documentation requirements, including the provision of Pre-ETS and transition services, for students seeking subminimum wage employment:

“SUBMINIMUM WAGE EMPLOYMENT

Section 511 of the WIOA imposes requirements on Education and Rehabilitation with regard to youth with disabilities seeking subminimum wage employment. Rehabilitation and Education shall work cooperatively to ensure that the individual, before beginning work that is compensated at a subminimum wage, has completed, and produces documentation indicating completion of, each of the following actions:

1. The individual has received pre-employment transition services that are available to the individual under section 113, or transition services under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.) such as transition services available to the individual under section 614(d) of that Act (20 U.S.C. 1414(d)).
2. The individual has applied for vocational rehabilitation services under title I, with the result that-
 - a. the individual has been found ineligible for such services pursuant to that title and has documentation consistent with section 102(a)(5)(C) regarding the determination of ineligibility; or

- b. the individual has been determined to be eligible for vocational rehabilitation services;
- c. the individual has an individualized plan for employment under section 102;
- d. the individual has been working toward an employment outcome specified in such individualized plan for employment, with appropriate supports and services, including supported employment services, for a reasonable period of time without success; and
- e. the individual's vocational rehabilitation case is closed; and
- f. the individual has been provided career counseling, and information and referrals to Federal and State programs and other resources in the individual 's geographic area that offer employment-related services and supports designed to enable the individual to explore, discover, experience, and attain competitive integrated employment; and
- g. such counseling and information and referrals are not for employment compensated at a subminimum wage provided by an entity described in this subsection, and such employment-related services are not compensated at a subminimum wage and do not directly result in employment compensated at a subminimum wage provided by an entity described in this subsection.

Any student considering subminimum wage employment upon exiting high school should be referred to Rehabilitation. When appropriate, Rehabilitation may request documentation from Education for purposes related to this section. Rehabilitation will collect and document the necessary prerequisites, corresponding services, and information (described above) required of individuals (aged 24 and younger) seeking subminimum wage employment. This documentation will be provided to the individual within 45 days after the completion of services, or 90 days if a longer period of time is needed due to extenuating circumstances.

Furthermore, this agreement assures, pursuant to 34 CFR 397.31, that Rehabilitation and Education agree not to enter into a contract or other arrangement with an entity for purposes of operating a program in which youth with disabilities are employed at subminimum wage.”

DRS has a long history of closely working with the state and local education agencies. Since the implementation of WIOA, DRS has further strengthened these working relationships. DRS has worked with the West Virginia Office of Special Education to align West Virginia Department of Education (WVDE) policy with aspects of WIOA, particularly the provision of Pre-ETS. The WVDE and DRS have jointly developed materials that are distributed to special education students and teachers across the state.

During FY 2019, DRS held a joint training conference with the West Virginia Office of Special Education. This conference, the West Virginia Capacity Building Institute, provided cross-training to over 200 staff from education and over 125 staff from DRS to ensure that services are provided more effectively and efficiently. Attendees gained an enhanced understanding of the roles and responsibilities of DRS and the WVDE, and how to better serve West Virginia students with disabilities. Due to the success of this training conference, future joint conferences are being planned with the Office of Special Education.

Also, during FY 2019, in-depth training was provided to special education teachers in 19 counties across the state, including the West Virginia Schools for the Deaf and the Blind. The

training covered DRS' "Pathways to the Future" Pre-ETS website. In upcoming years, special education teachers from remaining counties and the Office of Diversion and Transition Programs will receive the training.

DRS' Pathways to the Future materials were updated in FY 2019 and distributed to students with disabilities across the state during the 2019-2020 school year. The materials include:

- Pre-ETS transition slide guide
- Parent/student guide
- Transition Services Planner
- Sample Lessons for Life After High School

As part of its ongoing outreach activities, DRS developed new Pathways to the Future banners and posters during FY 2019. These are being distributed to all high schools in the state to ensure that students, parents, and teachers are aware of the availability of Pre-ETS. Additional outreach using large posters will target eighth grade, career and technical education, and postsecondary students at locations across the state to ensure that students ages 14-21 are aware of the availability of Pre-ETS. The banners are also used by DRS during job fairs, transition fairs, and other activities involving students with disabilities.

As part of the Comprehensive Statewide Needs Assessment (CSNA), DRS attempted a one-on-one Pre-ETS needs assessment discussion with teachers and administrators in all of West Virginia's 55 counties. DRS was able to get participation from 110 high schools in 54 counties in 2019. While all six DRS districts were represented, no schools from Jefferson County (in District 6) participated in this particular part of the CSNA, despite repeated requests. However, DRS does have information regarding Pre-ETS needs from different sources (e.g., consumers and DRS counselors) in all 55 counties. DRS continues to ensure that Pre-ETS are available to students with disabilities on a statewide basis. Details and results of this assessment are provided in the Statewide Assessment section of the state plan.

To better serve students, DRS has offices located in some of the state's largest schools, as well as the West Virginia Schools for the Deaf and the Blind. Additionally, counselors visit every high school in the state to initiate rehabilitation services needed for transition from school to work. This allows the counselor to develop a collaborative relationship and assist the student in identifying goals, services, and service providers related to employment options prior to transition. In FY 2019, there were 73 rehabilitation counselors assigned to work with the state's 55 local education agencies and the West Virginia Schools for the Deaf and Blind.

School rehabilitation counselors also are invited to participate in Individualized Education Program (IEP) meetings. During these meetings the counselor describes DRS services, policies, and procedures as appropriate. The DRS counselor determines the student's eligibility and order of selection category utilizing information generated from the school, the student, and DRS. Prior to or shortly after the student's IEP transition meeting occurs, development begins on the student's Individual Plan for Employment (IPE) so both the student and counselor have an idea of what rehabilitation services will be necessary to meet the student's vocational goal. Therefore, if the student needs additional training or assessment prior to vocational goal determination, this information is already collected so that planned rehabilitation services may begin. IPE development and approval for students with disabilities, including those able to be served if DRS is on an order of selection, will begin as early as appropriate during the transition process, but before the student, determined to be eligible, leaves the school setting.

DRS also assists WVDE with Graduation 20/20, a West Virginia initiative that uses a data driven intervention framework developed by the National Dropout Prevention Center for Students with Disabilities (NDPC-SD) to address issues that have negatively impacted school completion. Graduation 20/20 utilizes the innovation configuration of evidence-based transition practices and predictors of post school success to guide professional learning which was published by the Collaboration for Effective Educator, Development, Accountability, and Reform (CEEDAR) Center. The program, using tools from NDPC-SD and CEEDAR, trains local school-based teams and team leaders to diagnose the causes of dropout and develop site-specific improvement plans and strategies.

Information about the DRS school program is widely disseminated to education professionals as well as students and their parents. An updated fact sheet and new brochure explaining DRS transition services is available. DRS has negotiated an agreement with the West Virginia Higher Education Policy Commission for its consumers who attend in-state public colleges and universities. The agreement describes the financial responsibility of DRS and the appropriate public institution of higher education, provides procedures to resolve interagency disputes, and coordinates policies and procedures to ensure timely delivery of vocational rehabilitation services. To better serve individuals in post-secondary school, DRS has liaisons assigned to 43 post-secondary community/technical colleges, 4-year colleges, and universities across the state.

DRS also coordinates with the WVDE Office of Adult Education and Workforce Development, a WIOA core partner, to better serve individuals receiving adult education. The agencies have a formal Memorandum of Understanding (MOU) and collaborate at the state and local level. The MOU includes screening students for potential disabilities, including learning disabilities, and the collaboration between WVDE and DRS to provide necessary accommodations (e.g., assistive technology, interpreters) for eligible individuals. DRS will evaluate the disability or disabilities and provide specific recommendations regarding testing accommodations, recommendations for instructional accommodations and recommendations for job accommodations. If it is found that the student requires assistive technology (which includes information technology products such as software applications, operating systems, web-based information applications, web accessibility, video equipment, multimedia products, and office equipment) then WVDE and DRS will share, as appropriate, the cost for this technology. If it is determined that the person has a hearing disability and it is deemed necessary that an interpreter, CART (Communication Access Realtime Translation), note-taker, or other appropriate accommodations be provided, then WVDE and DRS will share the cost. WVDE will only hire qualified interpreters who are registered through the West Virginia Commission for the Deaf and Hard of Hearing.

2. Information on the formal interagency agreement with the State educational agency with respect to:

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

The formal agreement includes the following:

CONSULTATION AND TECHNICAL ASSISTANCE

Rehabilitation agrees to provide consultation and technical assistance services to Education, as well as to LEAS, in order to aid them in the planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services

and other vocational rehabilitation services. Rehabilitation will provide Education and LEAs with information, as appropriate, regarding disability awareness, disability etiquette, accommodations and assistive technology, eligibility for Rehabilitation and the application process, vocational rehabilitation services, the availability of community-based services, independent living, competitive integrated employment, and career pathways. Additionally, Rehabilitation will provide consultation and technical assistance to Education and LEAs regarding pre-employment transition services including job exploration and labor market information, opportunities for work-based learning experiences, post-secondary enrollment opportunities, workplace readiness training opportunities, and self-advocacy.

Rehabilitation assures that communication with Education officials shall be done in the most meaningful and convenient manner possible. To that end, Rehabilitation will provide consultation and technical assistance through a variety of methods, including face-to-face contact, phone calls, e-mail, conference calls, and video conferencing.

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

The formal agreement includes the following:

TRANSITION AND PRE-EMPLOYMENT TRANSITION SERVICES PLANNING

It is important that Education and Rehabilitation work together to determine logistics for providing transition and pre-employment transition services. The IEP and the IPE must be developed with coordinated goals, objectives and planned services for effective and successful transition to post-school settings. Each agency will cooperate to provide referral, support, relevant documentation, and assistance to the agency with responsibility for services.

IDEA 2004 and WIOA require the individual's participation in the development of the IEP and IPE, respectively, and emphasize informed choice. Identification of transition services for the IEP is focused on a coordinated set of activities which considers the student's preferences and interests. Likewise, the IPE is developed by a rehabilitation counselor and the individual by identifying goals through reviewing assessments, individual strengths, resources, interests, and needs. Education and Rehabilitation provide both awareness and exploration activities in the areas of living, learning, and work to support decisions about post school outcomes. This interagency cooperation assures the provision of transition and pre-employment transition services that prepare the student to pursue adult goals.

The participation of Rehabilitation counselors in the IEP process will help students and parents understand the differences in and facilitate the provision of educational and rehabilitation services. To this end, Rehabilitation counselors should be invited to IEP meetings, when appropriate, to provide information on available services and eligibility requirements. The Rehabilitation counselor may also assist in the development and coordination of the IEP and the IPE. Both Education and Rehabilitation should document any coordinated services outlined in both the IEP and the IPE. Planning, coordinating and providing transition and pre-employment transition services for students with disabilities may be conducted at the state and local level to maximize service provision and individual choice.

Professional development activities between Education and Rehabilitation, when and where appropriate, shall be provided and facilitated by Education and/or Rehabilitation staff, including support of regional transition teams, participating in topic specific learning events and book studies.

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 formal agreement includes the following:

DETERMINATION OF AGENCY RESPONSIBILITY

Education, through participation in IDEA 2004, has assured the USDE that it has established general supervisory authority over all education programs administered within the State.

General supervisory authority means that:

1. All programs serving eligible students meet all requirements of IDEA 2004;
2. All programs serving eligible students within the state must meet State standards; and
3. Funds which support services to eligible school age students with disabilities, including state and local education funds and funds under Title V, Title VI, Title IX, and Title XX of the Social Security Act, will continue to provide any and all services provided by these funds prior to the passage of IDEA 2004; and no program will alter eligibility requirements for participating in federal, state, and local programs in order to increase the financial responsibility of agencies receiving IDEA 2004 funds. Part B of IDEA does not limit the responsibility of agencies other than educational agencies for providing for and paying for some or all of the costs of FAPE to students with disabilities in the State.

The State Education Agency (SEA) and Local Education Agencies (LEAs) have responsibility for providing appropriate special education and related services for each eligible student with a disability, ages 3 to 21, enrolled in the public-school system. For each eligible student with a disability at age 16 or younger, if determined appropriate, the transition service needs of the student must be identified, including interagency linkages. From the perspective of the SEA and LEAs, students with disabilities shall have equal access to services that are normally provided by public schools for non-disabled individuals, provided that reasonable accommodations or modifications can be made.

Transition services are defined in IDEA 2004 as a coordinated set of activities for a student with an exceptionality that are designed within a results-oriented process focused on improving the academic and functional achievement of the student to facilitate movement from school to post-school activities including postsecondary education; vocational education; competitive, integrated employment; continuing and adult education; adult services; independent living or community participation.

Rehabilitation is mandated by WIOA, in collaboration with local education agencies (LEAs), including the county-level Boards of Education in each of West Virginia's 55 counties, to provide or arrange for the provision of pre-employment transition services to students with disabilities (ages 14-21) in need of such services who are eligible or potentially eligible for Rehabilitation services - specifically, those students with an IEP and those students with a disability for the purposes of section 504. The five required pre-employment transition service activities are: 1) job exploration counseling; 2) work-based learning experiences; 3) counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs; 4) workplace readiness training; and 5) instruction in self-advocacy.

Rehabilitation is required to conduct, at a local level, a CSNA to determine the need for the five required Pre-ETS activities. The CSNA will be used to determine: 1) the level of need for each of

the required Pre-ETS activities, statewide; 2) the amount of service provision delivered by the Education system regarding these five required activities; and 3) the amount of service gap that remains for Rehabilitation to provide. Those Pre-ETS activities not provided by Education will be supplemented by Rehabilitation, as appropriate, and based on the availability of resources.

For students with disabilities, the responsibility for vocational services rests with Rehabilitation. Rehabilitation will provide services, which are legally the responsibility of Rehabilitation, for those individuals determined to be eligible for Rehabilitation services

Eligibility for Rehabilitation services is determined by the following criteria:

- An individual must have a physical or mental impairment which, for that individual, constitutes or results in a substantial impediment for employment; and
- The individual can benefit in terms of an employment outcome from vocational rehabilitation services.

FINANCIAL RESPONSIBILITY OF EDUCATION

Education assumes responsibility for all expenses incurred in the provision of special education and related services to achieve FAPE when those services, including assistive technology devices and services, are necessary for the student's educational program or course of study, as well as participation in school activities and during the pendency of any interagency dispute.

Private Insurance Funds: With regard to services required to provide FAPE to an eligible student under this part, Education may access a parent's private insurance only if the parent provides informed consent consistent with federal regulations pursuant to IDEA 2004. Each time Education proposes to access the parent's private insurance, it must:

1. Obtain written parental consent; and
2. Inform the parent that their refusal to permit the school district to access the private insurance does not relieve the school district of its responsibility to ensure that all required services are provided at no cost.

Public Insurance Funds: Education may use the Medicaid or other public insurance benefits programs in which a student participates to provide or pay for services required. With regard to services required to provide FAPE to an eligible student under this part, Education may not:

1. Require parents to sign up for or enroll in public benefits or insurance programs in order for their child to receive FAPE under IDEA regulations;
2. Require parents to incur an out-of-pocket expense, such as the payment of a deductible or co-pay included in filing a claim for services provided pursuant to this part, but may pay the cost that the parent otherwise would be required to pay; and
3. Use a student's benefits under a public benefits or insurance program if that use would (a) decrease available lifetime coverage or any other insured benefit; (b) result in the family paying for services that would otherwise be covered by the public benefits or insurance program and that are required for the child outside of the time the child is in school; (c) increase premiums or lead to the discontinuation of benefits or insurance; or (d) risk loss of eligibility for home and community-based waivers, based on aggregate health-related expenditures.

To access a student's public insurance (e.g., Medicaid reimbursement), the school district must obtain and maintain documentation of parent/adult student consent specifying the records to be disclosed, the services to be provided, and the extent, frequency, and duration of the services. The school district must also obtain parent/adult student consent if billable services (i.e., type, amount and/or duration) are revised at any time. The parents must be informed that their refusal to consent to the release of information does not relieve the school district of its responsibility to ensure that all services are provided at no cost to the parents.

If Education is unable to obtain parental consent to use the parent's private insurance, or public benefits or insurance when the parents would incur a cost for a service specified on their child's IEP, the school district may use Part B funds to pay for services to ensure FAPE. To avoid a financial cost to parents who otherwise would consent to use private insurance or public benefits or insurance if the parent would incur a cost, the school district may use its Part B funds to pay the cost the parents otherwise would have to pay to use the parents' benefits insurance (e.g., the deductible or co-pay amounts).

Proceeds from public or private insurance will not be treated as program income as pursuant to 34 CFR 580.25(2). If a school district spends reimbursements from Federal funds (e.g., Medicaid) for services under this part, those funds will not be considered "State or local" funds for purposes of the maintenance of effort provisions of Part B of IDEA 2004.

FINANCIAL RESPONSIBILITY OF REHABILITATION

Rehabilitation may be responsible for services that occur outside of the school environment that are vocationally oriented and are specifically intended to prepare students with disabilities to transition into postsecondary training or work, including pre-employment transition services, in accordance with the CSNA. Rehabilitation is not otherwise responsible for payment of any service that has not been directly agreed to during the development of a student's IEP and is not included as a service on a student's IPE for Rehabilitation services. Rehabilitation is not responsible for career development activities that are part of a School to Work initiative within the school system. The responsibility for implementing the requirements of Department of Education Policy 2510 remains with the school system.

The transference to the student of assistive technology devices that have been purchased by an LEA will occur consistent with the surplus equipment policies and regulations in existence within each LEA. After the student has exited the school system, Rehabilitation may reimburse the LEA at a rate in accordance with the surplus equipment policy, dependent upon the student's continued need or desire for the equipment, the condition of the equipment, and its future usefulness.

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

At present, DRS has representation in all West Virginia high schools. DRS counselors/staff regularly communicate with local school personnel to promote the awareness and usage of VR services. When permitted, DRS school counselors maintain an office in high schools to strengthen the DRS resolve to serve students with disabilities (ages 14-21). DRS continually sponsors grants and activities to educate all stakeholders in high schools about VR services and employment opportunities for students with disabilities.

The State Education Agency (SEA) and Local Education Agencies (LEAs) have responsibility for providing appropriate special education and related services for each eligible student with a disability, ages 3 to 21, enrolled in the public-school system. For each eligible student with a

disability at age 16 or younger, if determined appropriate, the transition service needs of the student must be identified, including interagency linkages. From the perspective of the SEA and LEAs, students with disabilities shall have equal access to services, which are normally provided by public schools for non-disabled individuals, provided that reasonable accommodations or modifications can be made.

It is important that Education and Rehabilitation work together to determine logistics for providing transition services. The IEP and the IPE must be developed with coordinated goals, objectives, and planned services for effective and successful transition to post-school settings. Each agency will cooperate to provide referral, support, and assistance to the agency with responsibility for services.

The formal agreement includes the following:

OUTREACH AND IDENTIFICATION

Rehabilitation and Education will continue to utilize a variety of activities to provide outreach to and identification of students with disabilities who are in need of transition and pre-employment transition services. These activities will be conducted both jointly and individually for students with IEPs, students with 504 plans, and other potentially eligible students with disabilities not currently receiving services. Activities may include, but are not limited to, participation in career/job fairs, presentations to students and parents, website links, brochures, surveys, conferencing between Rehabilitation School Counselors and School Counselors, and regularly scheduled contact with individual schools.

Outreach activities and student identification will be conducted as early as possible, preferably during the students' 10th grade year and shall include information regarding (1) the purpose of the Rehabilitation program; (2) the eligibility requirements of the Rehabilitation program; (3) the application procedures of the Rehabilitation program; and (4) the scope of services that may be provided by the Rehabilitation program.

E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

Cooperative Agreements with Private Non-Profit Vocational Rehabilitation Service Providers

The state network of Community Rehabilitation Programs (CRPs) is critical to the effective and efficient delivery of vocational rehabilitation (VR) services to individuals with significant disabilities. CRPs also provide services, including pre-employment transition services (Pre-ETS), to students with disabilities. As of October 2019, there are 72 DRS-acknowledged parent company CRPs in West Virginia located at 80 service sites. There are also an additional 67 Student Transition to Employment Program (STEP) vendors that focus on serving students with disabilities.

DRS maintains working relationships with non-profit CRPs in West Virginia that provide supported and direct employment, community-based assessment, and/or work skills assessment. CRPs also provide employment readiness services such as life skills and work adjustment, job site training, and extended employment assessment. While respecting freedom of choice, DRS encourages work center programs to expand community-based programs for these individuals.

Any CRP meeting the DRS acknowledgment process will be permitted under a written Vendor Acknowledgement to bill for services provided to DRS consumers. In order to become a DRS-acknowledged vendor, an applicant must request, complete, and return a Vendor Acknowledgement Packet. Upon receipt of the completed packet, a recommendation to acknowledge or not acknowledge will be made to the DRS Director.

The Vendor Acknowledgement Packet contains an application for Vendor Acknowledgement to provide supported employment services, an annual data summary that provides the agency's name, address, contact information, a checklist of those DRS services they will be providing, and a Vendor Acknowledgement form addressing conditions of and payment for services rendered to DRS consumers.

A signed Vendor Acknowledgement indicates that the vendor agrees to follow conditions set forth regarding standards, anti-discrimination, indemnification, and conditions/standards of operation. The acknowledgement is good for three years.

CRPs can also supplement work exploration activities and provide opportunities for VR consumers, especially students, statewide. DRS also utilizes school personnel as CRP vendors as part of STEP. These teacher/vendors work with students outside of school hours to provide them with CRP services such as community-based assessment, work skills assessment, work adjustment training, job placement, and job coaching. The students benefit from working with a trusted adult who is already familiar with the student's strengths and weaknesses. This eliminates the need for new and/or additional assessment by the service provider. Furthermore, this program allows DRS to ensure services are available in rural areas. DRS has made it an agency goal and priority to expand CRP service availability.

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

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.

The West Virginia Division of Rehabilitation Services (DRS) continues to concentrate efforts on educating interested parties regarding the process of becoming a non-traditional provider source for supported employment services. A variety of supported employment provider choices are needed, particularly due to the rural nature of the state.

DRS continues to focus on providing technical assistance and coordinating training for vendors of supported employment services, DRS staff members, and staff members of other public and private agencies. DRS keeps current on changes and advances in supported employment through documented research, literature, and reviews of best practices.

Other agencies with which DRS collaborates for the provision of time-limited supported employment services are:

1. West Virginia Developmental Disabilities Council funds;
2. West Virginia Title XIX--Home and Community-Based Waiver Program for intellectual/developmental disabilities (I/DD) recipients; and
3. Social Security Administration work incentives programs.

In implementing school-to-work transition services for individuals exiting the school system, DRS also collaborates with family resource networks.

Through a combined effort with other disability organizations, \$78,000 was appropriated (annually since 2017) by the West Virginia Legislature for supported employment follow-along services (extended supported employment services). DRS serves as the fiscal agent for these funds. DRS has created program guidelines governing the use of state-appropriated funds for extended services under the supported employment program created by state statute in 1993. The sole use of the state funds attached to this program is to provide extended services for individuals not eligible from any other funding source. All providers of supported employment services may access these funds for individuals who are eligible under the guidelines. At the end of Program Year 2019, DRS had sponsored 37 individuals in the extended supported employment program so they could maintain and retain their jobs within the community. This figure represents the cooperative efforts of 10 CRPs.

Agreements between DRS and all acknowledged providers of supported employment services document collaboration for extended services. Each agreement details the time-limited and extended services that DRS will secure through the vendor.

Extended services specified in the agreement will be provided by the vendor and include, at minimum, monitoring two hours per month (no more than eight) at the job site of each individual unless the individual can be better served through off-site monitoring. If off-site monitoring is determined to be appropriate, it must, at a minimum, consist of two hours per month with the individual and at least one contact with the employer during those hours. The vendor also agrees to provide other support services as needed and specified in the Individualized Plan for Employment.

In addition to the basic vendor agreement identifying the time-limited and extended services to be mutually provided by DRS and the vendor, DRS has attempted to collaborate with other agencies and organizations to provide funding for extended services.

These sources of extended supported employment services are:

1. West Virginia Title XIX--Homes and Community-Based Waiver Program for I/DD recipients;
2. DRS program funds for persons receiving extended services at DRS-acknowledged CRP work centers; and
3. Social Security Administration programs such as Impairment Related Work Expenses and Plan To Achieve Self Support for approved Social Security recipients.

DRS continues its efforts to expand the number of acknowledged vendors of supported employment services, particularly in areas underserved and unserved within the current system. As of September 2019, the number of supported employment service providers was 61, an increase of 23 providers since Fiscal Year 2006.

G. COORDINATION WITH EMPLOYERS

Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

1. VR SERVICES; AND

The West Virginia Division of Rehabilitation Services (DRS) believes that coordination with employers is integral to improving the workforce development system. Gathering/collecting information about employer needs, which will also be shared with other Workforce Innovation and Opportunity Act (WIOA) partners, allows DRS to provide training and other services to vocational rehabilitation (VR) consumers in order to meet business needs and expectations of current and future workers. To optimize its coordination with employers to identify competitive integrated employment and career exploration opportunities for consumers with disabilities, DRS takes a multi-faceted approach. DRS utilizes its own personnel in addition to partnering with WorkForce West Virginia to coordinate with employers across the state. Additionally, DRS has specific programs/strategies to identify employment and career exploration opportunities for students with disabilities, including the provision of pre-employment transition services (Pre-ETS). The strategies that DRS uses are described below.

DRS has an in-house Employer Services Section that specializes in providing employers with disability-related information, services, and pre-screened job seekers. The DRS Employer Services Section has nine employment specialists that cover all 55 counties in West Virginia. DRS' team of employment specialists provide business owners and employers with critical business options and assistance in staffing, employee retention strategies, education on disability-related issues, job accommodations, and information about financial incentives for employers who hire individuals with disabilities. In the previous fiscal year, employment specialists provided 814 services to 529 employers, attended 60 job fairs, coordinated with WorkForce West Virginia, attended statewide and local Business Services Team meetings, participated in rapid response events, attended local workforce development board (LWDB) meetings, provided Job Clubs for students with disabilities, and participated in opportunities for collaboration with community colleges, community rehabilitation programs, and other organizations responsive to workforce needs of businesses.

Sample of services provided to employers:

- Pre-screened qualified applicants to reduce employers' cost of recruitment and hiring.
- Consultation, recommendation, and training for retention of employees who acquire a disability.
- Technical assistance on the Americans with Disability Act (ADA).
- Accessibility options and solutions.
- Employer on-site disability awareness training.
- Information on tax credits available to employers.

Direct contact with employers is a key strategy to identify competitive integrated employment and career exploration opportunities for VR consumers, including students with disabilities. Employment Specialists contact employers to identify current and future job openings. To complement this, DRS utilizes labor market information provided by WorkForce West Virginia to identify the top employers in each county; contact is always made with the top ten employers in each county. When meeting with employers, employment specialists provide valuable information, including the DRS Employer Resource Guide. The resource guide provides the following information:

- Staffing services;
- Training programs and incentives for hiring people with disabilities;

- Financial incentives;
- Accessibility assessments;
- Accommodating employees with disabilities;
- Basic disability etiquette;
- Attitudinal barriers;
- Americans with Disabilities Act;
- Locating a DRS office; and
- Where to find additional resources.

The Employer Services Section maintains a database of each DRS–employer interaction with employment specialists. The information collected includes the business name, contact person, and current job openings by occupation. If needed, a referral to the DRS Rehabilitation Technology Unit is made to address workplace accommodations. This list is distributed to field staff to potentially match a job–ready VR consumer with a current job opening. Through positive working relationships, 47 employers, including some of the largest in the state, now send job postings directly to DRS’ Employer Services Section.

DRS also coordinates with employers through participation and membership in various community and regional organizations. These activities range from employer–specific organizations to public– private partnerships and allow DRS to better understand the needs of employers while jointly developing employment–related activities. Some of these partnerships include:

- Regional WDBs;
- Tri-State Society for Human Resource Management;
- Cabell County Family Resource Network;
- Greater Wheeling Reentry Policy Council;
- Chamber of Commerce of the Mid-Ohio Valley;
- Workforce Business Services Units – Fayette, Greenbrier, Mercer, Monroe, Nicholas, Pocahontas, Raleigh, Summers, and Webster counties; and
- Employment Specialists attend Community Relations Board meetings at the Federal Prisons in Alderson and Beckley.

Another key strategy to coordinate with employers is through collaboration with WorkForce West Virginia (WFWV), a WIOA core partner. WFWV is the state agency that oversees numerous U.S. Department of Labor programs. This partnership takes place at all levels, including local offices, regional workforce development boards, and state level Interagency Collaboration Team meetings. These partnerships have been of great benefit for West Virginians with disabilities seeking training and employment.

Because of the services it provides, WFWV has the largest database of both job seekers and job openings in the state. DRS is able to tap into these resources to identify current employment opportunities for VR consumers, identify needs of employers across the state, and utilize detailed labor market information to assist individuals (including students) with disabilities in

identifying future career opportunities. This allows VR consumers to identify potential employment opportunities and any training or other VR services that are required for the job. Additionally, job-ready VR consumers can create an account with WFWV to match with employers seeking workers with specific skills they already possess.

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

In addition to the previously described activities, the Employer Services Section also works with employers to better serve transitioning youth with disabilities, including providing career exploration opportunities for students with disabilities. In 2015, DRS debuted the Positive Outcomes Within Education and Rehabilitation (POWER) program. POWER is a job shadowing program that offers transitioning students, who may be having a difficult time choosing a career path, the opportunity to experience an occupation by spending time with a professional working in the students' vocational goal/career field of interest. The POWER program allows the student the opportunity to experience an occupation prior to committing to training. It guides the student to take a serious, realistic look at the occupation, allowing the student to make a more informed choice. As of November 2019, 85 employers have agreed to host job shadowing experiences with DRS' POWER program.

Employment specialist services, including Pre-ETS, provided to students with disabilities:

- POWER job shadowing program;
- Transition fairs;
- Job readiness workshops;
- Job clubs;
- Interviewing;
- Resume preparation;
- Application assistance;
- Dressing for an interview/employment;
- Job retention and good work habits;
- Job search and employer contacts;
- Assist students in locating employment opportunities and assisting with applying to openings; and
- Advocating on the student's behalf to employers when requested by the student.

H. INTERAGENCY COOPERATION

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

DRS maintains a memorandum of understanding (MOU) with the West Virginia Department of Health and Human Resources (DHHR), Bureau for Medical Services (BMS), the state agency

responsible for the State Medicaid plan under the title XIX of the Social Security Act; this is also known as the Waiver program. An advisory group for the program is constituted with the West Virginia Developmental Disability Council (WVDDC). DRS has a position on the council. DRS and BMS interact as part of this advisory group through the WVDDC. The primary involvement of the Title XIX Medicaid Waiver program in fostering competitive, integrated employment outcomes through vocational rehabilitation is by mandating referral to DRS and providing ongoing support funding for those cases closed by DRS in Supported Employment. The WVDDC also advises BMS on policy development and meeting unmet needs of those participating in the Title XIX Medicaid Waiver program.

In addition to interacting with Title XIX Medicaid Waiver staff as part of the WVDDC meetings, DRS participates in two subcommittees; Employment First and Medley Management. The Employment First committee focuses on promoting employment for intellectually/developmentally disabled (IDD) individuals as a first option among services providers, legislators, state policy makers, and the community at large. The Medley Management committee provides oversight and advice to the Bureau for Behavioral Health on the state's Medley program, which serves a specific group of IDD individuals that are at risk of institutionalization. These are often individuals that are also title XIX Medicaid Waiver eligible. On both of these committees, DRS promotes a focus on competitive, integrated employment outcomes.

DRS counselors will, at the time of application, gather information regarding an individual's third-party resources, including Medicaid. If it is determined that the individual receives Medicaid benefits, BMS will provide all Medicaid-covered services to the individual, regardless of that individual's continued status with DRS. If an individual is approved to receive services from DRS and begins to receive Medicaid benefits at a later time, BMS will provide all Medicaid-covered services to the individual from that time forward.

Individuals receiving services from BMS will receive information on the eligibility requirements for DRS and the services DRS provides. If an individual receiving services from BMS expresses a desire to work, he or she will be referred to DRS at that time. Similarly, DRS consumers who are Medicaid-eligible will be referred to BMS.

DRS also maintains an MOU with the Division of Intellectual and Developmental Disabilities (DIDD), within the West Virginia Department of Health and Human Services, Bureau for Behavioral Health (BBH), the State agency with primary responsibility for providing services and supports for individuals with intellectual disabilities and individuals with developmental disabilities. DRS interacts with both BBH and its subsidiary, DIDD.

DRS, BBH, and DIDD agree to collaborate to facilitate delivery of services, including extended services, to individuals with the most significant disabilities in the following ways:

- The DIDD program manager and DRS will interact regularly as part of the WVDDC meetings, as well as on the Employment First and Medley Management committees. The Employment First committee focuses on promoting employment for IDD individuals as a first option among services providers, legislators, state policy makers, and the community at large. The Medley Management committee provides oversight and advice to the BBH on the state's Medley program, which serves a specific group of IDD individuals that are at risk of institutionalization. On both of these committees, DRS promotes a focus on competitive, integrated employment outcomes.

- The BBH administers several Customized Employment grants with vendors of DRS. BBH and DRS will jointly train the Community Rehabilitation Programs receiving these grants as well as DRS staff working with these programs.
- BBH and DRS will work together in mediating problems in cases being served jointly in the programs.
- DRS will meet monthly with BBH staff to review applicants for an Unmet Needs funding program to foster assistance to IDD individuals where traditional funding sources do not provide needed supports.
- Individuals receiving services from BBH or DIDD will receive information on the eligibility requirements for DRS and the services DRS provides. If an individual receiving services from BBH or DIDD expresses a desire to work, he or she will be referred to DRS at that time.

DRS collaborates with the BBH and its partners, in order to provide quality and timely vocational rehabilitation services to West Virginians with behavioral health conditions who qualify.

DRS and BBH staff regularly attend various meetings to receive program updates which allows for collaboration whenever possible. Examples of meetings include:

- The Olmstead Council – DRS and BBH are both state agencies that are required to participate in quarterly Olmstead Council meetings. Olmstead v. L.C. (1999) is a landmark United States Supreme Court decision upholding the civil rights of people with disabilities (including those with behavioral health conditions that result in disability) to receive services and support in the most integrated setting in the community.
- BBH and DRS are two of the principal state agencies that must have membership on the West Virginia Behavioral Health Planning Council (WVBHPC) and attend quarterly meetings working together and with others to accomplish the goals of the council. The WVBHPC is a unified voice that promotes wellness, recovery, and resiliency for all West Virginians. The primary purpose of the WVBHPC is to advocate for and evaluate the provision of community-based behavioral health services.
- DRS and BBH are two of the principal state agencies that must have membership on the West Virginia Statewide Independent Living Council (SILC) and attend quarterly meetings allowing each agency to get program updates and collaborate wherever possible. The West Virginia SILC's mission is to ensure persons who have disabilities have access to community-based resources that promote personal choice and facilitate the achievement of their independent living goals.

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

DRS maintains an MOU with the West Virginia Department of Health and Human Resources, BMS, the state agency responsible for the State Medicaid plan under the Title XIX of the Social Security Act; this is also known as the Waiver program. An advisory group for the program is constituted with the WVDDC. DRS has a position on the council. DRS and BMS interact as part of this advisory group through the WVDDC. The primary involvement of the Title XIX Medicaid Waiver program in fostering competitive, integrated employment outcomes through vocational rehabilitation is by mandating referral to DRS and providing ongoing support funding for those cases closed by DRS in Supported Employment. The WVDDC also advises BMS on policy development with the goal of meeting unmet needs of those participating in the Title XIX Medicaid Waiver program.

In addition to interacting with Title XIX Medicaid Waiver staff as part of the WVDDC meetings, DRS participates in two subcommittees, Employment First and Medley Management. The Employment First committee focuses on promoting employment for IDD individuals as a first option among services providers, legislators, state policy makers, and the community at large. The Medley Management committee provides oversight and advice to the Bureau for Behavioral Health on the state's Medley program, which serves a specific group of IDD individuals that are at risk of institutionalization. These are often individuals that are also title XIX Medicaid Waiver eligible. On both committees, DRS promotes a focus on competitive, integrated employment outcomes.

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

The West Virginia Department of Health and Human Services, Bureau for Behavioral Health is the federally designated State Authority for mental health and substance abuse, as well as the lead agency for intellectual and developmental disabilities and provides planning, direction, training and funding for prevention, treatment and recovery services throughout the state. DRS also maintains an MOU with the Division of Intellectual and Developmental Disabilities (DIDD), within the West Virginia Department of Health and Human Services, Bureau for Behavioral Health (BBH). DRS interacts with both BBH and its subsidiary, DIDD.

DRS, BBH, and DIDD agree to interact in the following ways to facilitate delivery of services, including extended services, to individuals with the most significant disabilities:

- The BBH administers several Customized Employment grants with vendors of DRS. BBH and DRS will jointly train the Community Rehabilitation Programs receiving these grants as well as DRS staff working with these programs.
- BBH and DRS will work together in mediating problems in cases being served jointly in the programs.
- Individuals receiving services from BBH or DIDD will receive information on the eligibility requirements for DRS and the services DRS provides. If an individual receiving services from BBH or DIDD expresses a desire to work, he or she will be referred to DRS at that time.

DRS collaborates with the BBH and its partners in order to provide quality and timely vocational rehabilitation services to West Virginians with behavioral health conditions who qualify.

DRS and BBH regularly attend various meetings together to receive program updates which allows for collaboration whenever possible. Examples of meetings include:

- The Olmstead Council – DRS and BBH are required state agencies that participate in quarterly Olmstead Council meetings. Olmstead v. L.C. (1999) is a landmark United States Supreme Court decision upholding the civil rights of people with disabilities (including those with behavioral health conditions that result in disability) to receive services and support in the most integrated setting in the community.
- BBH and DRS are two of the principal state agencies that must have membership on the West Virginia Behavioral Health Planning Council (WVBHPC) and attend quarterly meetings working together and with others to accomplish the goals of the council. The WVBHPC is a unified voice that promotes wellness, recovery, and resiliency for all West Virginians. The primary purpose of the WVBHPC is to advocate for and evaluate the provision of community-based behavioral health services.

- DRS and BBH are two of the principal state agencies that must have membership on the West Virginia Statewide Independent Living Council (SILC) and attend quarterly meetings allowing each agency to get program updates and collaborate wherever possible. The West Virginia SILC's mission is to ensure persons who have disabilities have access to community-based resources that promote personal choice and facilitate the achievement of their independent living goals.

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

Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

1. SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

A. QUALIFIED PERSONNEL NEEDS

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

I. THE NUMBER OF PERSONNEL WHO ARE EMPLOYED BY THE STATE AGENCY IN THE PROVISION OF VR SERVICES IN RELATION TO THE NUMBER OF INDIVIDUALS SERVED, BROKEN DOWN BY PERSONNEL CATEGORY;

DRS is committed to providing a comprehensive system of personnel development (CSPD) that complies with Section 101(a)(7)(A) of the Rehabilitation Act Amendments of 1998 and Section 721(a)(7)(A) of the Rehabilitation Act, as amended by the Workforce Innovation and Opportunity Act (WIOA) of 2014. Members of the State Rehabilitation Council are afforded the opportunity to review and comment upon this entire section, particularly the DRS plan for recruitment, preparation, and retention of qualified personnel, agency personnel standards, and staff development needs and activities.

Provisions of this section should assist in recruiting and retaining qualified staff members to ensure skilled personnel are available to provide rehabilitation services to individuals with disabilities. Furthermore, these endeavors will help ensure an improved level of competence and expand and improve vocational rehabilitation services for individuals with disabilities, especially those with the most significant disabilities, allowing them to reach employment.

The Human Resources Unit is primarily responsible for performing DRS personnel administration activities in keeping with guidance from the West Virginia Division of Personnel (WVDOP), Rehabilitation Services Administration, Social Security Administration, and other appropriate bodies. The DRS Staff Development Unit administers the in-service training grant program. The Quality Assurance (QA) Unit also works closely with the Field Services Unit to ensure quality and timely training for new field counselors and rehabilitation services associates (RSAs).

The following narrative describes the DRS CSPD and policies, procedures, and activities relating to the establishment and maintenance of standards to ensure that personnel needed within DRS are appropriately and adequately prepared and trained for DRS operations.

DRS Data System on Personnel and Personnel Development Needs

Statistics and information utilized for personnel planning are maintained within the Human Resources Unit. DRS administrators have the ability to review salary, pay grade, job title, reporting unit, and personal employee information. Such information is available to DRS Assistant Directors and District Managers who use it for planning, hiring negotiations, and pay equity. DRS retiree information may also be obtained from these databases.

The Human Resources Senior Manager periodically (at least monthly) maintains and provides statistical data to the DRS Director. The data are a list of the number of individuals under various classifications who are employed by DRS in the provision of rehabilitation services. This includes a ratio of the number of counselors to the number of consumers served each year. DRS estimates the ratio of consumers served (6,466) to the number of counselors (80) will be 81 in Federal Fiscal Year (FY) 2021.

Each year, the DRS Director receives a summary report that estimates and projects the number of such personnel that will be needed during the next five-year period. In November 2019, DRS had 80 counselors in various offices across the state. Of the 80 counselors, DRS had 33 Rehabilitation Counselors, 32 Senior Rehabilitation Counselors, 12 Certified Rehabilitation Counselors and 3 Rehabilitation Counselor Trainees. DRS believes its existing counselors and field staff members are needed to provide services to consumers who are currently in the DRS system.

DRS had several unfilled positions as of November 2019: 27 Rehabilitation Counseling positions, 17 Senior Rehabilitation Counselor positions, 4 Certified Rehabilitation Counselor positions and 4 Rehabilitation Counselor Trainee positions. Each unfilled position is being used to expand the number of field counselors when needed.

A breakdown by personnel category, including the number of personnel in relation to the estimated number of individuals served in FY 2021, is as follows (information current as of November 2019):

- Rehabilitation Counselors, 60 total positions, 27 vacancies, and 7 projected vacancies over the next five years. The number of Rehabilitation Counselors in relation to the number of individuals served is 108.
- Senior Rehabilitation Counselors, 49 total positions, 17 vacancies, and 10 projected vacancies over the next five years. The number of Senior Rehabilitation Counselors in relation to the number of individuals served is 132.
- Certified Rehabilitation Counselors, 16 total positions, 4 vacancies, and 6 projected vacancies over the next five years. The number of Certified Rehabilitation Counselors in relation to the number of individuals served is 404.
- Rehabilitation Counselor Trainee, 6 total positions, 4 vacancies, and 0 projected vacancies over the next five years. The number of Rehabilitation Counselors in relation to the number of individuals served is 1,078.
- Fiscal personnel, 14 total positions, 7 vacancies, and 1 projected vacancy over the next five years. The number of Fiscal personnel in relation to the number of individuals served is 462.
- Administrative Services personnel 24 total positions, 8 vacancies, and 6 projected vacancies over the next five years. The number of Administrative Services personnel in relation to the number of individuals served is 269.

- Field Services personnel, 158 total positions, 43 vacancies, and 77 projected vacancies over the next five years. The number of Field Services personnel in relation to the number of individuals served is 41.
- Support Services personnel (e.g., human resources, rehabilitation technology unit), 31 total positions, 9 vacancies, and 12 projected vacancies over the next five years. The number of Support Services personnel in relation to the number of individuals served is 209.
- Information Technology personnel, 10 total positions, 2 vacancies, and 3 projected vacancies over the next five years. The number of Information Technology personnel in relation to the number of individuals served is 647.
- Other personnel (e.g., vocational instructors, technical analysts), 27 total positions, 6 vacancies, and 15 projected vacancies over the next five years. The number of other personnel in relation to the number of individuals served is 239.

II. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES,
BROKEN DOWN BY PERSONNEL CATEGORY; AND

Each year, the DRS Director receives a summary report that estimates and projects the number of such personnel that will be needed during the next five-year period. In November 2019, DRS had 80 counselors in various offices across the state. Of the 80 counselors, DRS had 33 Rehabilitation Counselors, 32 Senior Rehabilitation Counselors, 12 Certified Rehabilitation Counselors and 3 Rehabilitation Counselor Trainees. DRS believes its existing counselors and field staff members are needed to provide services to consumers who are currently in the DRS system.

DRS had several unfilled positions as of November 2019: 27 Rehabilitation Counseling positions, 17 Senior Rehabilitation Counselor positions, 4 Certified Rehabilitation Counselor positions and 4 Rehabilitation Counselor Trainee positions. Each unfilled position is being used to expand the number of field counselors when needed.

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.

DRS expects to see a decrease in the number of consumers in its caseload system, from 8,240 individuals in FY 2019 to a projected 7,824 individuals in FY 2025. DRS administrators believe that the expected future caseload size will be managed by existing counseling personnel and the gradual filling of the 52 vacant counselor positions over the next five years. Additionally, DRS employs 36 RSAs to assist Counselors with their caseloads, in order to more efficiently meet the needs of the increasing numbers of consumers.

The following information presents a range of the number of counselors and other agency personnel projected to leave DRS employment after becoming eligible for early retirement under the West Virginia Public Employees Retirement System by FY 2025. Of the 23 counselors who will be eligible, there will be 7 Rehabilitation Counselors, 10 Senior Rehabilitation Counselors, and 6 Certified Rehabilitation Counselors. DRS continues to experience a gradual retirement of counselors and other personnel. The agency expects this trend will continue over the coming years.

B. PERSONNEL DEVELOPMENT

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

I. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM;

DRS annually collects information from higher education institutions that provide training to prospective rehabilitation personnel. Based on information provided by West Virginia University (WVU) and Marshall University, WVU reports 42 students enrolled in the Clinical Rehabilitation and Mental Health Counseling graduate program in the Fall 2018 semester and 11 graduates in the 2018–2019 period. For the Counseling graduate program, WVU reports 45 enrolled students and 21 graduates in the 2018–2019 period. For the Social Work graduate program, WVU reports an enrollment of 124 students and 83 graduates in the 2018–2019 period.

The report from Marshall University shows 178 students in fall 2018 and 35 graduates in Counseling graduate programs for 2018-19. It also reports 103 students in fall 2018 and 33 graduates in Psychology graduate programs for 2018-19.

II. THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND

DRS annually collects information from higher education institutions that provide training to prospective rehabilitation personnel. Based on information provided by WVU and Marshall University, WVU reports 42 students enrolled in the Clinical Rehabilitation and Mental Health Counseling graduate program in the Fall 2018 semester and 11 graduates in the 2018–2019 period. For the Counseling graduate program, WVU reports 45 enrolled students and 21 graduates in the 2018–2019 period. For the Social Work graduate program, WVU reports an enrollment of 124 students and 83 graduates in the 2018–2019 period.

The report from Marshall University shows 178 students in fall 2018 and 35 graduates in Counseling graduate programs for 2018-19. It also reports 103 students in fall 2018 and 33 graduates in Psychology graduate programs for 2018-19.

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.

DRS annually collects information from higher education institutions that provide training to prospective rehabilitation personnel. Based on information provided by WVU and Marshall University, WVU reports 42 students enrolled in the Clinical Rehabilitation and Mental Health Counseling graduate program in the Fall 2018 semester and 11 graduates in the 2018–2019 period. For the Counseling graduate program, WVU reports 45 enrolled students and 21 graduates in the 2018–2019 period. For the Social Work graduate program, WVU reports an enrollment of 124 students and 83 graduates in the 2018–2019 period.

The report from Marshall University shows 178 students in fall 2018 and 35 graduates in Counseling graduate programs for 2018-19. It also reports 103 students in fall 2018 and 33 graduates in Psychology graduate programs for 2018-19.

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

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the

designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

DRS Recruitment Efforts

DRS will continue its efforts to recruit and advance employees of traditionally under-represented groups such as people with disabilities, seniors, women, and members of racial or ethnic minority groups.

DRS Re-training Efforts for Existing Rehabilitation Professionals

DRS is in full compliance with the CSPD requirement and its standard to employ only rehabilitation counselors who (1) possess a master's degree in rehabilitation counseling or a counseling-related field, or (2) are employees who have two years of full-time or equivalent part-time paid experience in the position of Rehabilitation Counselor Trainee. As stated above, DRS makes no exceptions to the state standard when hiring new rehabilitation counselors. Therefore, the agency provides for existing personnel to receive the training necessary to meet requirements of the state standard.

As part of its non-discriminatory employment practices, DRS ensures that all personnel are selected for employment without regard to race, color, national origin, gender, age, or disability. The DRS affirmative action plan is updated annually, and the agency has formally adopted this policy of non-discriminatory employment practices.

3. PERSONNEL STANDARDS

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

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

To ensure a high standard of competency and credentials for its qualified rehabilitation professionals, DRS has established job classifications. The lowest standard for Rehabilitation Counselors requires a master's degree in rehabilitation counseling, counseling and guidance, social work, or closely related behavioral science field; or two years of experience as a Rehabilitation Counselor Trainee. Senior Rehabilitation Counselors require: (1) a master's degree in rehabilitation counseling or counseling-related field; and (2) two years of full-time or equivalent part-time paid professional experience in vocational rehabilitation counseling. Certified Rehabilitation Counselors require: (1) a master's degree in rehabilitation counseling or counseling-related field; (2) current national certification as a Certified Rehabilitation Counselor or Certified Vocational Evaluator or current West Virginia licensure as a Licensed Professional Counselor; and (3) at least three years of full-time or equivalent part-time paid professional experience as a rehabilitation counselor.

DRS has established the position of Rehabilitation Counselor Trainee. An employee in this position is under direct supervision and performs work at the entry level in a probationary, training capacity which is intended to qualify the employee for specific duties for this position. The employee may become eligible for the position of Rehabilitation Counselor after two years

of full-time or equivalent part-time paid experience in the position of Rehabilitation Counselor Trainee. Minimum qualifications for the Rehabilitation Counselor Trainee position are a bachelor's degree from a regionally accredited college or university in counseling and guidance, social work, nursing, special education, or related behavioral science or human service field; or a bachelor's degree from a regionally accredited college or university with three years of full-time or equivalent part-time experience in the position of Rehabilitation Services Associate.

DRS strives to recruit graduates of accredited master's degree programs in rehabilitation like the one at WVU, but it does not require the Certified Rehabilitation Counselor (CRC) credential as the minimum qualification for a new counselor. Graduates of accredited master's degree programs in rehabilitation counseling are eligible for certification by the Commission on Rehabilitation Counselor Certification (CRCC), which sets the national standards for quality rehabilitation counseling services in the U.S. DRS encourages the achievement of CRC by existing counselors and gives special preference to applicants with the CRC credential and qualified applicants with disabilities and from minority backgrounds.

The DRS standard is specific to rehabilitation counselors only and is consistent with registration requirements of WVDOP—the DRS state hiring authority. WVDOP administers and scores unassembled examinations to potential rehabilitation counselor candidates.

To ensure that counselors and other personnel remain up to date with evolving labor force needs and the needs of individuals with disabilities, DRS provides ongoing training opportunities for its field staff in group and individual settings. This occurs through educational activities such as the State training conference, periodic district-level training sessions, continuing education credit opportunities (Certified Rehabilitation Counselor), and training sessions by DRS Quality Assurance Specialists and DRS Employment Specialists. These activities allow DRS counselors and field staff to enhance their knowledge of labor force needs and ultimately better serve individuals with disabilities.

Individuals not meeting the above personnel standards for rehabilitation professionals are ineligible to interview for vacant rehabilitation counseling positions. Classification specifications for each position utilized by DRS are available through the WVDOP website:

<https://www.governmentjobs.com/careers/wv/classspecs>.

When employing new rehabilitation counselors, DRS makes no exceptions to its standard and provides the training necessary to meet requirements of the state standard only to existing personnel. These efforts are described later in this section.

Should qualified candidates be unavailable, the DRS Director, Assistant Directors, Human Resources Manager, and the Unit Manager or District Manager may re-assess staffing/consumer needs and re-assign qualified employees to assume duties of the vacant position. Qualified DRS retirees may also be re-hired on a contractual/intermittent basis until permanent qualified employees can be hired.

The career ladder for advancement within the rehabilitation counseling ranks requires additional experience and credentials as well as increased responsibilities.

DRS Requirements for Qualified Rehabilitation Paraprofessionals

In order to more efficiently meet the needs of its consumers, DRS upgraded several clerical positions to paraprofessional status. A Rehabilitation Services Associate must be a high school (or equivalent) graduate and have at least four years of full-time or equivalent part-time paid experience in paraprofessional or responsible clerical office support work, which requires

familiarity with casework procedures and delivery of direct consumer services in a state vocational rehabilitation services agency. A bachelor's degree from an accredited four-year college or university may be substituted for the required experience. The WVDOP specification for the Rehabilitation Services Associate position may be accessed at <https://www.governmentjobs.com/careers/wv/classspecs>.

A Rehabilitation Services Associate assists qualified rehabilitation counselors in several ways: providing information about the rehabilitation process and services available to interested applicants and members of the general public; obtaining information needed to complete the application process; initiating vocational diagnostic interviews; arranging medical, psychological, and vocational evaluations for DRS consumers; and assisting consumers in applying for student financial aid.

DRS employed 36 Rehabilitation Services Associates as of November 2019. These paraprofessionals are assigned to DRS offices throughout West Virginia. To ensure statewide coverage, at least one is located within each DRS district.

System of Staff Evaluation

DRS requires that each permanent employee receive an annual job performance evaluation. Work performance of probationary employees is reviewed upon completion of the third and sixth (and for certain job classifications, twelfth) months during a probationary period. This evaluation system enables DRS to monitor the job performance of all staff members and identify areas of weakness and skill deficiencies that need training or remediation, as well as areas of strong performance. The evaluation also provides a systematic method of determining training needs for all staff members.

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.

To ensure a high standard of competency and credentials for its qualified rehabilitation professionals, DRS has established job classifications. The lowest standard for Rehabilitation Counselors requires a master's degree in rehabilitation counseling, counseling and guidance, social work, or closely related behavioral science field; or two years of experience as a Rehabilitation Counselor Trainee. Senior Rehabilitation Counselors require: (1) a master's degree in rehabilitation counseling or counseling-related field; and (2) two years of full-time or equivalent part-time paid professional experience in vocational rehabilitation counseling. Certified Rehabilitation Counselors require: (1) a master's degree in rehabilitation counseling or counseling-related field; (2) current national certification as a Certified Rehabilitation Counselor or Certified Vocational Evaluator or current West Virginia licensure as a Licensed Professional Counselor; and (3) at least three years of full-time or equivalent part-time paid professional experience as a rehabilitation counselor.

DRS has established the position of Rehabilitation Counselor Trainee. An employee in this position is under direct supervision and performs work at the entry level in a probationary, training capacity which is intended to qualify the employee for specific duties for this position. The employee may become eligible for the position of Rehabilitation Counselor after two years of full-time or equivalent part-time paid experience in the position of Rehabilitation Counselor Trainee. Minimum qualifications for the Rehabilitation Counselor Trainee position are a bachelor's degree from a regionally accredited college or university in counseling and guidance,

social work, nursing, special education, or related behavioral science or human service field; or a bachelor's degree from a regionally accredited college or university with three years of full-time or equivalent part-time experience in the position of Rehabilitation Services Associate.

DRS strives to recruit graduates of accredited master's degree programs in rehabilitation like the one at WVU, but it does not require the CRC credential as the minimum qualification for a new counselor. Graduates of accredited master's degree programs in rehabilitation counseling are eligible for certification by the CRCC, which sets the national standards for quality rehabilitation counseling services in the U.S. DRS encourages the achievement of CRC by existing counselors and gives special preference to applicants with the CRC credential and qualified applicants with disabilities and from minority backgrounds.

The DRS standard is specific to rehabilitation counselors only and is consistent with registration requirements of WVDOP—the DRS state hiring authority. WVDOP administers and scores unassembled examinations to potential rehabilitation counselor candidates.

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Should qualified candidates be unavailable, the DRS Director, Assistant Directors, Human Resources Manager, and the Unit Manager or District Manager may re-assess staffing/consumer needs and re-assign qualified employees to assume duties of the vacant position. Qualified DRS retirees may also be re-hired on a contractual/intermittent basis until permanent qualified employees can be hired.

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for the Rehabilitation Services Associate position may be accessed at <https://www.governmentjobs.com/careers/wv/classspecs>.

A Rehabilitation Services Associate assists qualified rehabilitation counselors in several ways: providing information about the rehabilitation process and services available to interested applicants and members of the general public; obtaining information needed to complete the application process; initiating vocational diagnostic interviews; arranging medical, psychological, and vocational evaluations for DRS consumers; and assisting consumers in applying for student financial aid.

DRS employed 36 Rehabilitation Services Associates as of November 2019. These paraprofessionals are assigned to DRS offices throughout West Virginia. To ensure statewide coverage, at least one is located within each DRS district.

System of Staff Evaluation

DRS requires that each permanent employee receive an annual job performance evaluation. Work performance of probationary employees is reviewed upon completion of the third and sixth (and for certain job classifications, twelfth) months during a probationary period. This evaluation system enables DRS to monitor the job performance of all staff members and identify areas of weakness and skill deficiencies that need training or remediation, as well as areas of strong performance. The evaluation also provides a systematic method of determining training needs for all staff members.

4. STAFF DEVELOPMENT

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

A. 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

Staff Development and Training Activities

The selection of DRS participants for training activities is based upon documented organizational, unit, or individual training needs. Training programs will be provided for all classes and types of staff members on an internally assessed priority basis. Particular emphasis is placed on programs addressing assessment, vocational counseling, job placement, policy and procedure, ethics, and rehabilitation technology. DRS does not discriminate in the selection of trainees for these programs based on age, sex, religion, disability, and national or ethnic origin.

DRS is committed to utilizing only institutions or training facilities that are accessible programmatically and architecturally free of other barriers with respect to trainees with disabilities. In addition, DRS will ensure that program materials are accessible in the most appropriate format for all participants with disabilities (assistive communication devices, interpreters, large print, audio tapes, Braille material, etc.). The technology to ensure these accommodations is available through various support units within DRS. Moreover, to promote equal access for individuals with disabilities in facilities of higher education, DRS houses a rehabilitation counselor on campus at Marshall University.

The majority of the training needs are met through local training and the agency's annual State Training Conference. DRS also maintains strong cooperative and collaborative relationships with institutions of higher education, particularly those receiving funds from the Rehabilitation Services Administration to train rehabilitation professionals. This is to ensure that personnel needed within DRS are appropriately and adequately prepared for employment.

Throughout FY 2019, DRS continued to utilize a group training approach for newly hired counselors and RSAs. The training is led by QA Unit staff members and consists of three two-day sessions, provided on a quarterly basis for new hires. The first session is titled "New Counselor/RSA Training" and provides introductory materials as well as training on case management and agency policies and procedures. The second and third sessions cover Decision Tree Training, detailing appropriate case work practices from referral to closure. In addition to the training, a CRP services overview is provided in a one-on-one format. While staff members are on location in Nitro, they receive a Rehabilitation Services Program overview and a tour of the DRS Rehabilitation Technology Unit.

This approach ensures that all rehabilitation counselors and paraprofessionals receive standardized and accurate training. QA Unit staff members conduct regular case record reviews to ensure compliance with federal, state, and agency casework standards. Any deficiencies identified from the reviews are addressed through appropriate training.

All Staff Development Unit-sponsored programs provide continuing education credits that assist DRS CRCs, Licensed Professional Counselors, and members of other certified groups to maintain or obtain their certification. DRS has received approval authority from the CRCC to provide CRC continuing education credits for training programs meeting CRCC criteria.

In FY 2019, 32 DRS managers and supervisors attended management training events to meet the requirements for the West Virginia Division of Personnel Policy 18, which mandates specialized training for all supervisors and managers. New managers and supervisors are required to take eight classes in the first two years. All appropriate DRS staff members attended these required courses.

During FY 2019, the agency held several training conferences. In July, 80 staff members participated in the Blind/Visually Impaired Conference to improve services to that population. In August, 160 rehabilitation staff members participated in the agency's Pre-Employment Transition Services (Pre-ETS) Training Conference and 94 staff members attended the agency's Clerical Conference. The agency also held a joint training conference, the West Virginia Capacity Building Institute, with the West Virginia Department of Education, Office of Special Education. These conferences help ensure that all staff members are connected to the overall mission and vision of the agency.

In 2019, 34 different training sessions were approved for CRC credits, totaling 48.25 clock hours. DRS staff confront the challenge of refining and improving their skills and knowledge while dealing with the current explosion of knowledge, technology, and treatment modalities. The agency will continue to make intensive efforts to provide ongoing information that will ensure the skills of DRS employees are responsive to the needs of the people they serve.

With respect to training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998, DRS maintains a working relationship and a formal memorandum of understanding with the West Virginia Assistive Technology System (WVATS). In West Virginia, the WVATS, under the Center for Excellence in Disabilities at West Virginia University, is the administrator of the assistive technology grant. DRS is also

represented on the West Virginia Assistive Technology Board and works with WVATS in a number of ways, including:

- Maintain an updated resource database for Assistive Technology services in West Virginia;
- Participate in special projects (i.e., finding and advocating for accessible recreational resources);
- Provide information resources, awareness and training for consumers and professionals in assistive technology services and devices;
- Provide information to WVATS partners regarding DRS and other disability related subjects; and
- Participate as a member on an interagency team, Partnerships in Assistive Technologies, with a focus of interagency collaboration for the provision of Assistive Technology training and conferences.

B. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO DESIGNATED STATE UNIT PROFESSIONALS AND PARAPROFESSIONALS.

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- Maintain an updated resource database for Assistive Technology services in West Virginia;
- Participate in special projects (i.e., finding and advocating for accessible recreational resources);
- Provide information resources, awareness and training for consumers and professionals in assistive technology services and devices;
- Provide information to WVATS partners regarding DRS and other disability related subjects; and
- Participate as a member on an interagency team, PATHS, with a focus of interagency collaboration for the provision of Assistive Technology training and conferences.

5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

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

West Virginia does not have large populations of ethnic groups who speak a language other than English. Consequently, DRS has not experienced difficulties making its programs accessible and available statewide. The agency's main language accessibility needs concern people who are deaf, and each DRS district is staffed with a specialist counselor providing full access to programs and services for people who have deafness or hearing impairments.

DRS continues to work with the West Virginia Commission for the Deaf and Hard of Hearing to train and certify interpreters in order to strengthen the network of providers for people who are deaf, hard of hearing, or deaf-blind. Numerous workshops and seminars are conducted to increase the number of interpreters, improve their communication skills, and provide better statewide coverage. These coordinated efforts will continue as needed.

DRS also ensures that its employees and consumers with blindness or visual impairments receive information and materials in their preferred mode of communication through various accommodations. Upon request, various DRS support units provide such services as assistive communication devices, large print and/or Braille materials, audiotapes, and electronic (computer) copies.

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

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

DRS will continue to coordinate its system of personnel development with the West Virginia Department of Education's (WVDE) personnel development under the Individuals with Disabilities Education Act/No Child Left Behind Act of 2001. This coordination will include collaborative efforts to share information, liaison activities, and cooperative training endeavors for DRS school counselors, teachers, and WVDE employees, particularly those assigned to the Office of Special Education.

The DRS state level liaison attends WVDE training functions related to special education and disseminates information about education policy or law changes to DRS school counselors as needed. DRS school counselors also receive information during their annual meeting. DRS school counselors also participate in cross-training efforts. In some areas of the state, DRS school counselors and managers participate in local interagency planning groups where training issues are discussed and planned.

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;

To comply with provisions of Title I, Section 101, State Plans, of the Rehabilitation Act Amendments of 1998 and Section 721, State Plans, of the Rehabilitation Act as amended by the Workforce Innovation and Opportunity Act (WIOA), the West Virginia Division of Rehabilitation Services (DRS) and the West Virginia State Rehabilitation Council (WV SRC) conducted a three-year comprehensive statewide assessment of the vocational rehabilitation (VR) services needs of individuals with disabilities in West Virginia. The WV SRC established a sub-committee on the Comprehensive Statewide Needs Assessment (CSNA), which includes a representative from the Client Assistance Program (CAP), to work with the State Plan and Program Evaluation (SPPE) Unit of DRS in conducting the needs assessment study in 2018. The WV SRC-DRS Joint Committee on Needs Assessment was established in Fiscal Year (FY) 2018 to oversee the needs assessment activity. Joint committee members including those selected by WV SRC and DRS personnel were fully committed to the needs assessment study and want to ensure successful completion of its objectives.

Four major objectives of the comprehensive statewide needs assessment study included examination of the rehabilitation needs of: (1) individuals with significant and most significant disabilities, including their needs for supported employment services; (2) individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program; (3) individuals with disabilities served through other components of the statewide workforce development system; and (4) youth with disabilities, and students with disabilities, including their need for pre-employment transition services or other transition services. The role of community rehabilitation programs (CRPs) as service providers was reviewed to address the need to establish, develop, or improve CRPs in West Virginia.

To maintain effective and comprehensive service delivery programs for West Virginians with disabilities, the needs assessment identified various service needs of individuals with significant and most significant disabilities. Some needed services such as transportation, housing, and personal assistance are beyond the scope of the state VR program and thus, require coordination and cooperation among a diverse range of public and private agencies and other organizations serving West Virginians with disabilities. The needs assessment recognized the service providers' perceptions of the needs of consumers with disabilities, including rehabilitation services associates, counselors, supervisors and managers of DRS, CRPs, and Workforce Development Board members throughout West Virginia.

As part of the WV SRC-DRS Joint Committee on Needs Assessment, the SPPE Unit conducted the needs assessment study for the agency in conjunction with WV SRC, which was fully involved from inception to the reporting of the results.

As part of the intake process for VR services, a question regarding service needs was posed to potential DRS consumers at the time of application. The reported service needs were then recorded in the DRS electronic case management system. In 2018, SPPE staff members conducted a qualitative analysis of the reported service needs of 1,004 persons with disabilities of various age and disability groups statewide. Included in these active cases with expressed VR service needs across the state were 90 persons with significant disabilities from minority backgrounds, 13 individuals aged 65 or older, and 655 transitioning youth. The findings of this analysis are presented below.

**THE STATEWIDE NEEDS ASSESSMENT OF CONSUMERS WITH SIGNIFICANT DISABILITIES
RESULTS OF THE ANALYSIS OF THE REPORTED SERVICE NEEDS OF PERSONS WITH
SIGNIFICANT DISABILITIES**

In 2018, SPPE staff members, under guidance of the WV SRC–DRS Joint Committee on Needs Assessment, conducted a qualitative analysis of the reported service needs of 1,004 persons with significant disabilities of various age and disability groups statewide. These individuals represent a good sample of consumers with significant disabilities that will continue to seek assistance from agencies in coming years, *ceteris paribus*. All 55 counties in West Virginia were represented in the sample. The demographic profile of these individuals with significant disabilities consists of the following characteristics:

Gender: 51.7% male, 47.0% female, 1.2% no response, and 0.1% did not self-identify;

Race: 90.8% White, 9.0% Other (African American/Hispanic/ American Indian/Asian), 0.2% Unspecified;

Age: 59.2% under 22 years old, 16.8% 22-34 years, 9.0% 35-44 years, 13.7% 45-64 years, 1.3% 65 years or older; and

Primary Impairment: 6.4% Sensory/Communicative Impairments, 18.2% Physical Impairments, 75.4% Mental Impairments.

Comments from the 1,004 DRS case management records were analyzed and grouped into one or more of five general service themes: education, training, health, employment/CRP, and support. More specific service themes, within each general theme, were then determined for each comment.

As part of the Comprehensive Statewide Needs Assessment, DRS identified the following as the most frequently reported service needs in each of the categories of Education, Training, Health, Employment/CRP, and Support, based on the qualitative analysis of the reported service needs of 1,004 consumers with significant disabilities. The approximate percentage of consumers with significant disabilities reporting each service need is also listed below.

EDUCATION (22.2%): Other (59.2%); 2-yr or 4-yr College (40.8%); Vocational Education (2.7%); High School Education (1.8%); Graduate Degree Education (1.8%); Tutoring (0.9%).

TRAINING (38.7%): Business/Vocational Training (73.3%); Drive Training/Licensing (12.6%); Other (10.5%); Job Search Training/Assistance (7.7%); Career Planning Training (4.9%); On-The-Job Training/Job Trial (0.5%); Work Adjustment Training (0.5%); Independent Living Skills (0.3%).

HEALTH (4.3%): Hearing/Audiological Services (44.2%); Psychological/Psychiatric (25.6%); Other (23.3%); Eye Care (2.3%); Speech/Communication Therapy (2.3%).

EMPLOYMENT/CRP (78.1%): Job Placement (90.1%); Vocational Counseling and Guidance (12.2%); Other (3.3%); Vocational Evaluation (2.0%); Supported Employment (SE, 0.8%); Psychological Evaluation (0.6%); Community-Based Assessment (0.5%); Job Coaching Other Than SE (0.5%); Life Skills Training (0.4%); Small Business Development (0.4%); Worksite Modification or Accommodation (0.4%); Direct Placement by CRPs (0.3%); Work-Related Tools or Equipment (0.3%); Labor Market Information (0.1%).

SUPPORT (8.6%): Financial Assistance (69.8%); Other (9.3%); Assistive Technology (8.1%); Housing Assistance (5.8%); Transportation (5.8%); Orientation/Mobility Services (1.2%); Assistive Devices (1.2%); Vehicle Modification (1.2%).

Of the statewide total of 1,004 persons with significant disabilities at the time of their DRS application, 655 persons were determined to be of *transition status (age 24 and under)*. The

demographic profile of this subset of transition status individuals with significant disabilities consists of the following characteristics:

Gender: 53.0% male, 47.0% female;

Race: 91.5% White, 8.4% Other (African American/Hispanic/American Indian/Native Hawaiian/Asian), 0.2% Unknown;

Age: 81.4% under 20 years old, 18.6% 20–34 years; and

Primary Impairment: 4.4% Sensory/Communicative Impairments, 11.5% Physical Impairments, 84.1% Mental Impairments.

As part of the Comprehensive Statewide Needs Assessment, DRS identified the following as the *most frequently reported service needs* in each of the categories of Education, Training, Health, Employment/CRP, and Support, based on the qualitative analysis of the reported service needs of 655 transitioning youth with significant disabilities. The approximate percentage of transitioning youth with significant disabilities reporting each service need is also listed below.

EDUCATION (28.1%): Other (58.7%); 2-yr or 4-yr College (42.4%); Vocational Education (0.9%); Graduate Education (0.5%); High School Education (0.3%); Tutoring (0.3%).

TRAINING (45.2%): Business/Vocational Training (72.6%); Drive Training/Licensing (13.5%); Other (11.8%); Job Search Training/Assistance (6.8%); Career Planning Training (5.4%); On-The-Job Training/Job Trial (0.7%); independent living skills (0.3%).

HEALTH (2.9%): Psychological/Psychiatric (42.1%); Hearing/Audiological Services (31.5%); Other (21.1%); Speech/Communication Therapy (5.3%).

EMPLOYMENT/CRP (75.4%): Job Placement (88.3%); Vocational Counseling and Guidance (16.4%); Other (2.4%); Vocational Evaluation (2.4%); Psychological Evaluation (0.8%); Community- Based Assessment (0.8%); Job Coaching Other Than SE (0.5%); Life Skills Training (0.4%), Small Business Development (0.2%); Direct Placement by CRPs (0.2%); supported employment (0.2%).

SUPPORT (9.5%): Financial Assistance (87.1%); Other (6.5%); Housing Assistance (3.2%); Assistive Technology Services (3.2%); Transportation (1.6%).

Of the statewide total of 1,004 persons with significant disabilities at the time of their DRS application, 90 persons were determined to be of *minority status*. The demographic profile of this subset of minority status individuals with significant disabilities consists of the following characteristics:

Gender: 55.1% male, 44.9% female;

Race: 3.3% American Indian, 2.2% Asian, 75.6% African American, and 18.9% Hispanic;

Age: 52.2% under 20 years old, 21.1% 20–34 years, 6.7% 35–44 years, 17.8% 45–64 years, 2.2% 65 years or older; and

Primary Impairment: 6.7% Sensory/Communicative Impairments, 16.7% Physical Impairments, 76.7% Mental Impairments.

As part of the Comprehensive Statewide Needs Assessment, DRS identified the following as the most frequently reported service needs in each of the categories of Education, Training, Health, Employment/CRP, and Support, based on the qualitative analysis of the reported *service needs of*

90 consumers with significant disabilities from minority backgrounds. The approximate percentage of consumers with significant disabilities from minority backgrounds reporting each service need is also listed below.

EDUCATION (21.1%): Other (63.2%); 2-yr or 4-yr College (42.1%); Graduate Degree Education (5.3%).

TRAINING (45.6%): Business/Vocational Training (75.6%); Drive Training/Licensing (14.6%); Job Search Training/Assistance (9.8%); Other Training (4.9%); Career Planning Training (4.9%).

HEALTH (7.7%): Other (57.1%); Psychological/Psychiatric (42.9%); Hearing/Audiological Services (14.3%).

EMPLOYMENT/CRP (77.8%): Job Placement (92.9%); Vocational Counseling and Guidance (7.1%); Other (5.7%); Supported Employment (1.4%); Job Coaching Other Than SE (1.1%).

SUPPORT (8.9%): Financial Assistance (75.0%); Assistive Technology Services (25.0%); Other (12.5%).

Of the statewide total of 1,004 persons with significant disabilities at the time of their DRS application, 13 persons were determined to be aged 65 years or older. The demographic profile of this subset of *individuals with significant disabilities aged 65 years or older* consists of the following characteristics:

Gender: 38.5% male, 61.5% female;

Race: 84.6% White, 15.4% Other (African American/Hispanic/American Indian/Native Hawaiian/Asian), 0.0% Unknown;

Age: 100% 65 years or older; and

Primary Impairment: 23.1% Sensory/Communicative Impairments, 53.8% Physical Impairments, 23.1% Mental Impairments.

As part of the Comprehensive Statewide Needs Assessment, DRS identified the following as the most frequently reported service needs in each of the categories of Education, Training, Health, Employment/CRP, and Support, based on the qualitative analysis of the reported *service needs of 13 consumers with significant disabilities aged 65 years or older*. The approximate percentage of consumers with significant disabilities aged 65 years or older reporting each service need is also listed below.

EDUCATION (0.0%).

TRAINING (15.4%): Drive Training/Licensing (100.0%).

HEALTH (7.7%): Hearing/Audiological Services (100.0%).

EMPLOYMENT/CRP (76.9%): Job Placement (90.0%); Other (10.0%).

SUPPORT (30.8%): Assistive Technology (25.0%); Orientation/Mobility Services (25.0%); Housing Assistance (25.0%); Vehicle Modification (25.0%).

RESULTS OF THE SURVEY OF DRS FIELD STAFF ON THE NEEDS OF PERSONS WITH SIGNIFICANT DISABILITIES

DRS is mandated under the federal Rehabilitation Act to periodically conduct a needs assessment of persons with significant disabilities. As part of this process and in conjunction

with WV SRC, DRS issued a survey in 2018 to its field staff, including rehabilitation services associates, counselors, supervisors, and managers. The SPPE Unit developed a multiple-choice and open-ended response survey for DRS field staff to provide feedback on the service needs and service gaps of their consumers. The comprehensive survey asked them to offer their perceptions of the service needs and service gaps of persons with significant disabilities being served, including students with disabilities' need for pre-employment transition services (Pre-ETS). The survey also obtained the specific areas where service needs and gaps were perceived to exist. The survey instrument and methodology were based on previous needs assessment studies, as they generated valid and reliable information on the service needs of persons with significant disabilities in West Virginia.

Surveys were distributed by email from SPPE Unit staff to District Managers, who then distributed the surveys to field staff in their purview. Field staff were informed of the value and importance of their responses to the CSNA survey. Field staff were given approximately one month for survey completion and were told to contact SPPE Unit staff with any questions regarding the survey. Field staff were also instructed to submit completed surveys to the SPPE Unit via email. The survey was completed and submitted by 100 DRS field staff, including rehabilitation services associates, counselors, supervisors, and managers.

Respondent Information

The survey collected information about the respondent for use in data analyses and to assist DRS in making targeted and necessary changes based on the service needs and service gaps by office and district.

Respondents were asked to provide information about their primary caseload by selecting from: General Field, Blind/Visually Impaired, School/Transition, Deaf/Hearing Impairment. Respondents could select 'Other' and write-in a caseload not listed.

Respondents were asked to provide their DRS office location(s) and which county or counties in the state they covered.

Respondents were asked to provide the number of years they have worked in field services. Respondents were also asked to indicate job titles they have held at DRS by selecting from the following: Rehabilitation Counselor Trainee, Rehabilitation Counselor, Senior Rehabilitation Counselor, Certified Rehabilitation Counselor, Field Office Manager/Supervisor, District Manager, or Rehabilitation Services Associate. Respondents could also select 'Other' and write-in their job title if not listed.

Assessing Service Needs and Service Gaps

The main objective of the survey was to assess the service needs and service gaps for DRS consumers with significant or most significant disabilities. Seventy-one services were placed into six categories: Educational, Training, Health, Employment and CRP, Support, and Pre-ETS. Each service was accompanied by checkboxes in two columns: Need and Gap. Respondents were asked to "please indicate whether most of the consumers you serve in your area can benefit from the service" by placing an 'X' in the Need column for that service. Additionally, respondents were asked to "indicate whether you feel there is a service gap (i.e., services are needed, but not available in sufficient quantities) for each service by placing an 'X' in the Gap column." In each category (with the exception of Pre-ETS), respondents were also given the opportunity to include an "other" service by writing in and acknowledging whether a need or gap existed for that service.

Services from the survey are listed below by category:

Educational Services — High School Education, Special Education Service, Vocational Education, Adult Basic Education, 2-yr or 4-yr College, Graduate Education, Tutoring, and Literacy Instruction.

Training Services — Work Adjustment Training, Business/Vocational Training, Job Search Training/Assistance, On-The-Job Training/Job Trial, Career Planning Training, Training on Disability Rights, Training in Sign Language, Independent Living Skills, Life Skills Training, Drive Training/Licensing, Job Club Skills Training, Instruction in Reading Braille, and Instruction in Lip Reading.

Health Services — Physician's Services, Speech/Communication Therapy, Substance Abuse Treatment, Eye Care, Dental Care, Hospital Services, Occupational Therapy, Physical Therapy, Hearing/Audiological Services, and Psychological/Psychiatric Treatment.

Employment and CRP Services — Labor Market Information, Extended Assessment, Work Adjustment Training, Community Based Assessment, Trial Work Experience, Psychological Evaluation, Vocational Evaluation, Vocational Counseling and Guidance, Job Placement, Small Business Development, Worksite Modification or Accommodation, Work Skills Assessment, Life Skills Training, Direct Placement by CRPs, Job Development, Supported Employment (SE), Job Coaching Other than SE, Extended Supported Employment Service (ESES), and Work-related Tools or Equipment.

Support Services — Personal Assistant/Attendant Services, Reader Services, Orientation/Mobility Services, Housing Assistance, Assistive Devices (e.g., cane, wheelchair), Services to Family Members, Child Care, Peer Support, Post-Employment Services (follow-up), Transportation, Vehicle Maintenance/Repair, Financial Assistance, Assistive Technology Services, Interpreter Services, Home Modification, and Vehicle Modification.

Pre-Employment Transition Services — Job Exploration Counseling, Work-Based Learning Experiences, Counseling on Postsecondary Opportunities, Workplace Readiness Training, and Self-Advocacy Training.

Overall Service Needs for DRS Consumers

The survey included five questions where respondents were asked to list UP TO FIVE services that consumers need in their service area. The question was repeated for 1) consumers with disabilities in DRS general territories, 2) transitioning youth with disabilities (age 24 and younger), 3) individuals who are deaf/hearing impaired, 4) individuals who are blind/visually impaired, and 5) minority individuals with disabilities. Respondents were also asked to indicate if they did not have experience working with consumers described in each question.

Barriers to Employment

Respondents were asked to “indicate (with an ‘X’) whether any of the following are substantial barriers, preventing the consumers you serve from gaining and/or maintaining employment.”

Respondents were provided a list of the following 17 potential barriers:

- Slow Job Market
- Employer Attitudinal Barriers
- Consumer Attitudinal Barriers

- Lack of Long-Term Support after Job Placement
- Lack of Qualified Service Providers
- Loss of Disability Benefits and/or Food Assistance
- Family Support
- Lack of Available Rehabilitation Services from CRPs
- Lack of Physical Access to Employers or Services (e.g., ramps, etc.)
- Adequate Housing
- Lack of Information Regarding Disability Resources
- Lack of Personal Care Attendant Services
- Child Care
- Transportation
- Inadequate Medical Care and/or Medical Insurance
- Lack of Time Spent with VR Counselor
- DRS Budget Restriction

Space was provided to write-in and rate an additional barrier not found on the list, if needed.

Integration with Core Partners

The survey included three open-ended response questions regarding respondents' familiarity, experience, and recommendations on integrating services with Workforce Development System Core Partners of WorkForce WV and WV Adult Education:

1. In the space below, please describe your familiarity with the services that WorkForce WV and WV Adult Education provide and the level of need that our consumers with significant disabilities have for those services.
2. Please comment on your experiences with integrating service with WorkForce WV and WV Adult Education (e.g., using Labor Market Information, referrals to and from WorkForce WV, co-serving a client with Adult Education). In addition to your experiences, please discuss other activities that DRS could conduct with our core partners to further help our consumers with significant disabilities.
3. Please provide recommendations on how to better facilitate our partnerships with WorkForce WV and WV Adult Education (e.g., specific cross-trainings, co-location, etc.).

Other Comments

The survey concluded with two open-ended response questions: 1) "What can DRS provide you to better serve our consumers and help you perform your job more effectively and efficiently?" and 2) "Please provide any additional comments regarding unmet service needs of individuals with significant or most significant disabilities with whom you work."

Results

Results are based on 100 surveys that were completed and submitted by DRS field staff.

Respondent Information Primary Caseload

General Field caseloads were reported as the primary caseload by 39 (39% of the 100 respondents) respondents, while 34 (34%) reported a primary caseload of School/Transition. Six (6%) reported Blind/Visually Impaired primary caseloads and Deaf/Hearing Impaired primary caseloads were reported by three (3%) respondents. Twenty-one (21%) respondents indicated a primary caseload of "Other." These were generally managers with a specialty caseload, but also included some Rehabilitation Service Associates (RSAs). One of the "Other" respondents indicated a "School/Transition" and "Family" caseload. Two of the "Other" respondents indicated a mixed caseload of General Field and School/Transition. Further examination led to these respondents being categorized as having a primary caseload of School/Transition.

Office Location

The total number of respondents by district and office location are as follows:

District 1 (28 Respondents) — Charleston-14, Point Pleasant-3, Ripley-0, Spencer-1, Teays Valley-7, Multiple-3.

District 2 (20) — Clarksburg-6, Elkins-2, Morgantown-5, Fairmont-2, Weston-2, Multiple-3.

District 3 (6) — Parkersburg-0, New Martinsville-0, Weirton-5, Wheeling-1.

District 4 (10) — Beckley-2, Lewisburg-0, Oak Hill-0, Princeton-3, Summersville-3, Multiple-2.

District 5 (21) — Huntington-14, Logan-2, Marshall University-1, Mullens-1, Welch-2, Multiple-1.

District 6 (15) — Keyser-2, Martinsburg-3, Moorefield-4, Romney-0, Multiple-6.

Years of Experience in DRS Field Services

Of the 100 respondents, 98 reported the number of years worked in DRS Field Services. Respondents had varying amounts of experience working in Field Services, from less than one year to 35 years (mean = 9.4 years). Many respondents (34%) reported four or fewer years of Field Services experience.

Titles Held

All 100 respondents reported having held at least 1 title in Field Services. Of the 100 respondents, 19 reported having been Rehabilitation Counselor Trainees, 73 had been Rehabilitation Counselors, 37 had been Senior Rehabilitation Counselors, and 19 had been Certified Rehabilitation Counselors. There were 20 current/former RSAs, 20 current/former Branch Office Managers/Supervisors, and 7 current/former District Managers.

Service Need/Use

Service need/use for each service was assessed to allow respondents to indicate which services their consumers need/use most often. This was done independently of the service gap assessment as some services may be highly needed/used but are readily available and therefore do not require an increase in availability.

Services that were identified as needed by 50% or more of the total respondents are listed for each service category below with the percentage of respondents in parentheses:

Educational Services

Vocational Education (89%), 2-year or 4-year College (78%), Tutoring (73%) High School (66%), Special Education (60%), and Adult Basic Education (59%).

Training Services

Job Search Training/Assistance (85%), Career Planning (75%), Life Skills Training (75%), On-the-job Training/Job Trial (73%), Business Vocational (72%), Independent Living Skills (67%), Drive Training/Licensing (65%), Work Adjustment Training (62%), and Training on Disability Rights (59%).

Health Services

Psychological/Psychiatric Treatment (76%), Substance Abuse Treatment (58%), Physician's Services (57%), and Eye Care (50%).

Employment and CRP Services

Labor Market Information (79%), Vocational Counseling and Guidance (79%), Job Placement (79%), Community Based Assessment (73%), Psychological Evaluation (72%), Work Skills Assessment (71%), Vocational Evaluation (70%), Job Development (68%), Work Adjustment Training (66%), Direct Placement (66%), Life Skills (65%), Job Coaching (other than Supported Employment; 58%), Work-related tools or equipment (53%), and Trial Work Experience (51%).

Support Services

Transportation (81%), Financial Assistance (57%), and Assistive Technology (55%).

Pre-Employment Transition Services

Job Exploration Counseling (72%), Counseling on Postsecondary Opportunities (72%), Workplace Readiness Training (69%), Work-Based Learning Experiences (66%), and Self-Advocacy Training (64%).

Service Gaps

Respondents that indicated a perceived service gap were totaled for each service. The number and percentage of respondents who reported a gap for the service are in parentheses followed by the number of responses by DRS office location. Some respondents identified more than one office.

Educational Services

The five most commonly reported gaps for educational services were:

Tutoring (48, 48%) -- Beckley-2, Charleston-7, Clarksburg-2, Elkins-2, Fairmont-2, Huntington-8, Keyser-3, Lewisburg-1, Logan-1, Marshall-2, Martinsburg-2, Moorefield-4, Morgantown-2, Mullens-2, New Martinsville-1, Oak Hill-1, Point Pleasant-1, Princeton-2, Ripley-2, Romney-3, Spencer-2, Summersville-4, Teays Valley-2, Weirton-3, Welch-1, Weston-2, and Wheeling-1.

Literacy Instruction (21, 21%) -- Beckley-2, Charleston-1, Clarksburg-2, Fairmont-1, Huntington-2, Keyser-1, Lewisburg-1, Marshall-1, Martinsburg-1, Moorefield-1, Morgantown-3, Oak Hill-1, Point Pleasant-1, Princeton-1, Romney-1, Summersville-3, Teays Valley-1, and Weirton-2.

Adult Basic Education (19, 19%) -- Beckley-1, Charleston-3, Clarksburg-2, Elkins-1, Huntington-4, Keyser-1, Lewisburg-1, Logan-1, Marshall-1, Morgantown-1, Oak Hill-1, Point Pleasant-1, Princeton-1, Romney-1, Summersville-2, Weirton-2, and Wheeling-1.

Vocational Education (18, 18%) -- Beckley-1, Charleston-3, Clarksburg-1, Elkins-3, Huntington-3, Keyser-2, Lewisburg-1, Marshall-1, Martinsburg-1, Oak Hill-1, Summersville-3, Teays Valley-1, Weston-2, and Wheeling-1.

Special Education (13, 13%) -- Beckley-1, Charleston-3, Fairmont-2, Huntington-1, Keyser-3, Logan- 1, Point Pleasant-1, Romney-1, and Summersville-1.

Training Services

The five most commonly reported gaps for training services were:

Drive Training/Licensing (41, 41%) -- Beckley-2, Charleston-2, Clarksburg-2, Elkins-3, Fairmont-2, Huntington-8, Keyser-4, Lewisburg-1, Logan-1, Marshall-1, Martinsburg-2, Moorefield-1, Morgantown-1, Mullens-1, Oak Hill-1, Point Pleasant-2, Princeton-2, Ripley-1, Romney-2, Spencer- 1, Summersville-4, Teays Valley-2, Weirton-4, and Weston-2.

Life Skills (31, 31%) -- Beckley-1, Charleston-8, Clarksburg-2, Elkins-3, Huntington-3, Keyser-2, Logan-1, Marshall-1, Martinsburg-3, Moorefield-2, Morgantown-1, Mullens-1, Point Pleasant-2, Ripley-1, Romney-2, Spencer-1, Summersville-1, Weirton-2, and Weston-3.

Job Club Skills (30, 30%) -- Beckley-2, Charleston-2, Clarksburg-2, Elkins-2, Fairmont-1, Huntington-6, Keyser-2, Logan-1, Marshall-1, Martinsburg-3, Moorefield-1, Point Pleasant-3, Ripley- 1, Romney-2, Spencer-1, Summersville-1, Teays Valley-3, Weirton-1, Weston-3, and Wheeling-1.

On-the-job Training/Job Trial (29, 29%) -- Beckley-3, Charleston-5, Elkins-3, Huntington-3, Keyser-4, Lewisburg-1, Logan-2, Marshall-1, Martinsburg-1, Moorefield-1, Mullens-1, Oak Hill-1, Point Pleasant-2, Princeton-1, Romney-2, Summersville-3, Weirton-3, and Weston-2.

Sign Language Training (29, 29%) -- Beckley-1, Charleston-2, Clarksburg-2, Elkins-2, Fairmont-2, Huntington-2, Keyser-1, Lewisburg-1, Logan-1, Martinsburg-1, Moorefield-1, Morgantown-2, Oak Hill-1, Point Pleasant-2, Princeton-2, Ripley-1, Romney-1, Spencer-1, Summersville-2, Teays Valley- 5, and Weirton-3.

Health Services

The five most commonly reported gaps for health services were:

Psychological/Psychiatric Treatment (41, 41%) -- Beckley-1, Charleston-8, Elkins-3, Huntington-5, Keyser-5, Logan-1, Marshall-1, Martinsburg-1, Moorefield-3, Morgantown-2, Point Pleasant-1, Princeton-2, Ripley-1, Romney-3, Spencer-1, Summersville-2, Teays Valley-2, Weirton-4, Welch- 1, and Weston-1.

Substance Abuse Treatment (40, 40%) -- Beckley-3, Charleston-3, Clarksburg-2, Elkins-3, Fairmont- 1, Huntington-7, Keyser-5, Lewisburg-2, Logan-1, Marshall-1, Martinsburg-4, Moorefield-2, Morgantown-1, Oak Hill-2, Point Pleasant-1, Princeton-4, Romney-3, Summersville-4, Teays Valley- 3, Welch-2, Weston-1, and Wheeling-1.

Dental Care (40, 40%) -- Beckley-2, Charleston-6, Clarksburg-4, Elkins-3, Fairmont-2, Huntington-6, Keyser-2, Lewisburg-1, Logan-1, Marshall-2, Martinsburg-1, Morgantown-1, Mullens-1, Oak Hill-1, Point Pleasant-1, Princeton-3, Summersville-3, Teays Valley-2, Weirton-3, Weston-1, and Wheeling- 1.

Speech/Communication Therapy (21, 21%) -- Beckley-2, Charleston-4, Elkins-1, Fairmont-1, Huntington-2, Keyser-3, Lewisburg-1, Marshall-1, Martinsburg-2, Moorefield-2, Oak Hill-1, Point Pleasant-1, Princeton-2, Romney-1, Summersville-2, Teays Valley-1, Weirton-1, and Welch-1.

Eye Care (18, 18%) -- Beckley-1, Charleston-2, Clarksburg-2, Elkins-3, Fairmont-2, Huntington-1, Keyser-1, Logan-1, Martinsburg-2, Morgantown-1, Point Pleasant-1, Romney-1, Teays Valley-1, Weirton-1, and Weston-1.

Hearing/Audiological Services (18, 18%) -- Beckley-1, Charleston-2, Clarksburg-1, Elkins-2, Fairmont-2, Huntington-1, Keyser-2, Martinsburg-2, Moorefield-1, Morgantown-2, Point Pleasant-1, Romney-2, Summersville-2, Teays Valley-3, Weirton-1, and Weston-1.

Employment/CRP Services

The five most commonly reported gaps for employment/CRP services were:

Vocational Evaluation (37, 37%) -- Beckley-2, Charleston-7, Clarksburg-3, Elkins-2, Fairmont-1, Huntington-7, Keyser-5, Lewisburg-1, Logan-1, Marshall-1, Martinsburg-2, Moorefield-2, Oak Hill-1, Point Pleasant-2, Princeton-1, Romney-3, Summersville-2, Teays Valley-1, Weirton-4, and Weston-1.

Job Placement (31, 31%) -- Beckley-2, Charleston-4, Clarksburg-2, Elkins-2, Huntington-3, Keyser-4, Lewisburg-1, Logan-2, Marshall-1, Martinsburg-2, Moorefield-1, Oak Hill-1, Point Pleasant-2, Princeton-1, Romney-2, Summersville-2, Teays Valley-2, Weirton-3, Welch-2, and Weston-1.

Job Development (28, 28%) -- Beckley-2, Charleston-5, Elkins-4, Huntington-3, Keyser-4, Lewisburg-1, Marshall-1, Martinsburg-2, Moorefield-1, Oak Hill-1, Point Pleasant-1, Princeton-3, Romney-2, Summersville-2, Teays Valley-1, Weirton-3, and Weston-2.

Trial Work Experience (25, 25%) -- Beckley-1, Charleston-4, Elkins-3, Fairmont-2, Huntington-3, Keyser-2, Lewisburg-1, Logan-1, Martinsburg-1, Oak Hill-1, Point Pleasant-2, Princeton-2, Romney-2, Summersville-2, Weirton-4, Welch-1, and Weston-2.

Extended Supported Employment Services (24, 24%) -- Charleston-2, Elkins-2, Huntington-5, Keyser-4, Logan-1, Marshall-1, Martinsburg-1, Point Pleasant-2, Princeton-1, Ripley-1, Romney-2, Spencer-1, Summersville-2, Weirton-3, and Weston-1.

Support Services

The five most commonly reported gaps for support services were:

Transportation (64, 64%) -- Beckley-3, Charleston-6, Clarksburg-6, Elkins-4, Fairmont-3, Huntington-7, Keyser-7, Lewisburg-2, Logan-2, Marshall-1, Martinsburg-4, Moorefield-4, Morgantown-2, Mullens-1, Oak Hill-2, Point Pleasant-3, Princeton-3, Ripley-1, Romney-5, Spencer-1, Summersville-5, Teays Valley-7, Weirton-4, Welch-1, and Weston-4.

Housing Assistance (37, 37%) -- Beckley-3, Charleston-4, Clarksburg-4, Elkins-2, Fairmont-2, Huntington-4, Keyser-1, Lewisburg-1, Martinsburg-1, Moorefield-2, Morgantown-2, Oak Hill-1, Point Pleasant-2, Princeton-3, Romney-1, Summersville-4, Teays Valley-2, Weirton-2, Welch-1, Weston-1, and Wheeling-1.

Financial Assistance (33, 33%) -- Beckley-1, Charleston-5, Clarksburg-4, Elkins-3, Fairmont-3, Huntington-5, Keyser-2, Marshall-1, Martinsburg-1, Moorefield-1, Morgantown-1, Point Pleasant-2, Romney-2, Summersville-3, Weirton-2, Welch-2, Weston-1, and Wheeling-1.

Peer Support (32, 32%) -- Beckley-3, Charleston-3, Clarksburg-2, Elkins-3, Fairmont-3, Huntington- 2, Keyser-3, Lewisburg-1, Marshall-1, Martinsburg-1, Moorefield-2, Morgantown-2, Oak Hill-1, Point Pleasant-1, Princeton-1, Romney-1, Summersville-2, Teays Valley-3, Weirton-1, Welch-1, Weston-2, and Wheeling-1.

Child Care (30, 30%) -- Beckley-1, Charleston-3, Clarksburg-3, Elkins-1, Fairmont-3, Huntington-2, Keyser-2, Martinsburg-1, Moorefield-2, Morgantown-2, Point Pleasant-1, Princeton-1, Ripley-1, Romney-2, Spencer-1, Summersville-3, Teays Valley-3, Weirton-1, Welch-2, Weston-1, and Wheeling-1.

Pre-Employment Transition Services

The five most commonly reported gaps for Pre-ETS were:

Work-Based Learning Experiences (25, 25%) -- Charleston-4, Clarksburg-1, Elkins-2, Huntington-3, Keyser-2, Logan-1, Martinsburg-3, Moorefield-3, Mullens-1, Point Pleasant-1, Romney-2, Spencer-1, Summersville-2, Weirton-3, Welch-1, and Weston-1.

Workplace Readiness Training (25, 25%) -- Charleston-3, Clarksburg-1, Elkins-4, Huntington-2, Keyser-2, Logan-1, Martinsburg-2, Moorefield-2, Mullens-1, Point Pleasant-1, Princeton-1, Romney- 2, Spencer-1, Summersville-1, Weirton-1, Welch-1, and Weston-3.

Self-Advocacy Training (19, 19%) -- Charleston-4, Clarksburg-1, Elkins-2, Huntington-2, Keyser-2, Logan-1, Martinsburg-1, Moorefield-1, Point Pleasant-1, Princeton-1, Romney-2, Spencer-1, Summersville-2, Teays Valley-1, and Weston-1.

Job Exploration Counseling (13, 13%) -- Charleston-3, Clarksburg-1, Elkins-2, Huntington-2, Logan- 1, Martinsburg-1, Point Pleasant-1, Spencer-1, Summersville-1, and Weston-1.

Counseling on Postsecondary Opportunities (12, 12%) -- Charleston-3, Elkins-2, Huntington-2, Logan-1, Martinsburg-1, Moorefield-1, Ripley-1, Spencer-1, Summersville-1, and Weston-1.

Overall Service Needs for West Virginians with Disabilities

Respondents were asked to identify the top five overall service needs for different consumer groups with which they have experience with providing VR services. Respondents were asked to indicate if they did not have experience working with the consumer group. The number and percentage of respondents who indicated a gap for the service are in parentheses followed by the number of responses by DRS office location. Some respondents identified more than one office.

Note: New categories created to incorporate answers that were not specific to a pre-existing service category from the survey. For example, the "Overall Training" category was created to include a number of open-ended responses where the respondent indicated a need for training, but not a specific type; for example, "Training options" and "Training services." The Miscellaneous category contains individual responses that were not clear in meaning or otherwise could not be grouped into a particular theme.

General Territories

The survey asked participants to "Please list the TOP FIVE services that our consumers with disabilities in DRS general territories need within your service area." There were 82 respondents to this question. The most commonly reported service needs were:

Transportation (45, 54.88%) -- Beckley-4, Charleston-2, Clarksburg-4, Elkins-2, Fairmont-1, Huntington-3, Keyser-3, Lewisburg-2, Marshall-1, Martinsburg-2, Moorefield-1, Morgantown-4, Oak Hill-2, Point Pleasant-3, Princeton-5, Ripley-2, Romney-2, Spencer-3, Summersville-4, Teays Valley- 5, Weirton-4, Welch-1, and Weston-2.

Overall Training (28, 34.15%) -- Beckley-1, Charleston-3, Clarksburg-1, Elkins-1, Fairmont-3, Huntington-3, Keyser-2, Martinsburg-3, Moorefield-3, Morgantown-1, Mullens-1, Point Pleasant-2, Ripley-2, Romney-2, Spencer-3, Summersville-1, Teays Valley-2, Weirton-1, and Welch-1.

Job Placement (23, 28.05%) -- Beckley-1, Charleston-4, Clarksburg-3, Fairmont-3, Huntington-2, Keyser-1, Logan-1, Martinsburg-1, Moorefield-1, Morgantown-2, Point Pleasant-2, Ripley-1, Romney-1, Spencer-2, and Teays Valley-2.

Psychological/Psychiatric Services (17, 20.73%) -- Beckley-1, Charleston-5, Fairmont-1, Huntington- 5, Lewisburg-1, Martinsburg-1, Oak Hill-1, Princeton-1, Ripley-1, Spencer-1, Summersville-1, Teays Valley-1, Weirton-1, and Wheeling-1.

Substance Abuse Treatment (14, 17.07%) -- Charleston-3, Elkins-1, Huntington-7, Logan-1, Point Pleasant-1, Princeton-1, and Weston-1.

Transitioning Youth

The survey asked, "From your experience with transitioning youth with disabilities, please list the TOP FIVE services that you feel these consumers need in your service area." There were 74 respondents to this question. The most commonly reported service needs were:

Transportation (38, 51.35%) -- Beckley-3, Charleston-2, Clarksburg-3, Elkins-1, Fairmont-1, Huntington-2, Keyser-3, Lewisburg-2, Marshall-1, Martinsburg-3, Moorefield-1, Morgantown-4, Mullens-1, Oak Hill-2, Point Pleasant-2, Princeton-5, Ripley-1, Romney-3, Spencer-2, Summersville- 5, Teays Valley-2, Weirton-4, and Wheeling-1.

Job Exploration Counseling (26, 35.14%) -- Charleston-4, Clarksburg-4, Elkins-3, Fairmont-2, Huntington-3, Keyser-1, Martinsburg-1, Moorefield-1, Point Pleasant-2, Romney-1, Summersville-1, Teays Valley-3, Weirton-1, and Weston-2.

Work-Based Learning Experiences (23, 31.08%) -- Beckley-1, Charleston-1, Clarksburg-6, Fairmont- 3, Huntington-1, Keyser-2, Lewisburg-1, Logan-1, Martinsburg-2, Moorefield-4, Oak Hill-1, Point Pleasant-1, Princeton-3, Romney-2, Summersville-2, Teays Valley-1, Weirton-1, and Welch-1.

Workplace Readiness Training (16, 21.62%) -- Charleston-1, Clarksburg-2, Elkins-1, Fairmont-1, Keyser-2, Martinsburg-3, Moorefield-4, Morgantown-1, Point Pleasant-1, Princeton-1, Romney-2, Teays Valley-2, Welch-1, and Weston-2.

Overall Training (15, 20.27%) -- Charleston-3, Elkins-2, Fairmont-2, Keyser-1, Mullens-1, Point Pleasant-1, Princeton-1, Ripley-1, Spencer-2, Summersville-1, Teays Valley-2, and Weston-1.

Deaf/Hard of Hearing

Respondents were asked, "From your experience with individuals who are deaf/hard of hearing with disabilities, please list the TOP FIVE services that you feel these consumers need in your service area." There were 32 respondents to this question. The most commonly reported service needs were:

Hearing/Audiological Services (19, 59.38%) -- Beckley-1, Charleston-1, Clarksburg-1, Elkins-3, Martinsburg-1, Morgantown-1, Point Pleasant-2, Princeton-1, Teays Valley-2, Weirton-4, Weston-2, and Wheeling-1.

Interpreter Services (12, 37.50%) -- Beckley-1, Clarksburg-1, Keyser-2, Martinsburg-3, Moorefield-2, Morgantown-1, Point Pleasant-1, Romney-2, Teays Valley-4, Weirton-1, and Wheeling-1.

Assistive Technology (7, 21.88%) -- Charleston-1, Huntington-1, Moorefield-1, Morgantown-1, Ripley-1, Spencer-1, Teays Valley-1, and Wheeling-1.

Job Placement (6, 18.75%) -- Charleston-1, Clarksburg-1, Fairmont-1, Martinsburg-1, Morgantown-2, Point Pleasant-1, and Teays Valley-1.

Sign Language Training (5, 15.63%) -- Beckley-1, Clarksburg-2, Teays Valley-1, and Wheeling-1.

Blind/Visually Impaired

Respondents were asked, "From your experience with individuals who are blind/visually impaired with disabilities, please list the TOP FIVE services that you feel these consumers need in your service area." There were 26 respondents to this question. The most commonly reported service needs were:

Assistive Technology (12, 46.15%) -- Charleston-2, Clarksburg-2, Huntington-1, Keyser-2, Martinsburg-4, Moorefield-2, Morgantown-1, Romney-2, Teays Valley-1, and Wheeling-1.

Transportation (10, 38.46%) -- Beckley-1, Charleston-2, Clarksburg-2, Huntington-1, Keyser-1, Lewisburg-1, Martinsburg-1, Moorefield-1, Oak Hill-1, Princeton-1, Romney-1, Summersville-1, Weirton-2, and Wheeling-1.

Orientation/Mobility Services (7, 26.92%) -- Charleston-1, Clarksburg-2, Keyser-2, Martinsburg-3, Morgantown-3, and Romney-2.

Assessment (5, 19.23%) -- Beckley-1, Charleston-2, Clarksburg-1, Fairmont-1, Huntington-1, Lewisburg-1, Martinsburg-1, Princeton-1, and Summersville-1.

Job Placement (4, 15.38%) -- Charleston-2, Clarksburg-1, Fairmont-1, Keyser-1, Martinsburg-1, Moorefield-1, and Romney-1.

Minority Individuals

The survey asked, "From your experience with minority individuals with disabilities, please list the TOP FIVE services that you feel these consumers need in your service area." There were 64 respondents to this question. The most commonly reported service needs were:

Transportation (30, 46.88%) -- Beckley-4, Charleston-3, Elkins-1, Huntington-4, Keyser-2, Lewisburg-2, Marshall-2, Martinsburg-2, Moorefield-1, Morgantown-2, Oak Hill-2, Point Pleasant-2, Princeton-3, Ripley-1, Romney-1, Spencer-1, Summersville-2, Teays Valley-5, Weirton-2, and Welch-1.

Job Placement (17, 26.56%) -- Beckley-1, Charleston-2, Clarksburg-1, Fairmont-1, Huntington-4, Keyser-2, Marshall-1, Martinsburg-2, Moorefield-1, Morgantown-1, Point Pleasant-2, Romney-2, Teays Valley-3, and Welch-1.

Overall Training (16, 25%) -- Beckley-1, Charleston-2, Clarksburg-1, Elkins-1, Fairmont-1, Huntington-1, Keyser-3, Martinsburg-2, Moorefield-2, Morgantown-1, Mullens-1, Point Pleasant-1, Ripley-1, Romney-3, Spencer-1, Teays Valley-1, Weirton-1, Welch-1, and Weston-1.

Counseling and Guidance (11, 17.19%) -- Charleston-4, Clarksburg-2, Farimont-1, Huntington-2, Keyser-1, Marshall-1, Martinsburg-1, Moorefield-1, Romney-1, Teays Valley-1, and Wheeling-1.

Self-Advocacy (10, 15.63%) -- Clarksburg-3, Huntington-1, Martinsburg-1, Moorefield-1, Morgantown-1, Princeton-1, and Teays Valley-2.

Barriers to Employment

The top five most frequently indicated barriers were Transportation (92 responses), Slow Job Market (63), Lack of Family Support (63), DRS Budget Restrictions (57), and Employer Attitudinal Barriers (56).

Integration with Core Partners

DRS Field Staff members were asked three open-ended response questions regarding their familiarity, experience, and recommendations on integrating services with Workforce Development System Core Partners of WorkForce WV and WV Adult Education.

1. *In the space below, please describe your familiarity with the services that WorkForce WV and WV Adult Education provide and the level of need that our consumers with significant disabilities have for those services.*

There were 93 responses to this prompt. Responses were categorized on two dimensions: 1) Familiarity with services provided by WorkForce WV and WV Adult Education and 2) level of need for those services. For the familiarity dimension, responses were judged to express either high familiarity, some familiarity, or no familiarity. Twenty-three responses (24.7%) indicated high familiarity, 50 responses (53.8%) indicated some familiarity, and 20 responses (21.5%) indicated no familiarity. For the need dimension, responses were judged to express either high need, some need, or no indication. Seventeen responses (18.3%) indicated high need, 24 responses (25.8%) indicated some need, and 52 responses (55.9%) indicated no need.

* A large proportion of respondents expressed no indication of need, typically by not addressing the dimension of need in their response. This suggests that many respondents may have failed to recognize the two-part nature of the question or may have become so involved in discussing familiarity that they forgot to discuss need. Separating the item into two separate parts may remedy this in the future.

1. *Please comment on your experiences with integrating service with WorkForce WV and WV Adult Education (e.g., using Labor Market Information, referrals to and from WorkForce WV, co-serving a client with Adult Education). In addition to your experiences, please discuss other activities that DRS could conduct with our core partners to further help our consumers with significant disabilities.*

There were 89 responses to this prompt. Responses were categorized on two dimensions: 1) whether the field staff had experience with integrating services with WorkForce WV and WV Adult Education and 2) whether other activities that DRS could conduct with core partners were discussed. In categorizing experience with integrating services, mention of referral of individuals to a core partner was not regarded as service integration.

The responses of 17 field staff (19.1%) indicated experience with integrating services with core partners. Among the remaining responses, 19 field staff (21.35%) mentioned that they had referred consumers to partners or had received referrals from partners. Other field staff explicitly stated that they had limited or no experience with integrating services.

The responses of 19 field staff (21.35%) discussed activities that DRS could conduct with core partners. Among the remaining responses, five field staff (5.62%) discussed activities that core partners could conduct (e.g., forward labor market research information with a client's referral) to make things easier. Several others gave no recommendations.

1. *Please provide recommendations on how to better facilitate our partnerships with WorkForce WV and WV Adult Education (e.g., specific cross-trainings, co-location, etc.).*

There were 82 responses to this prompt. Suggestions with similar themes were grouped and some respondents provided comments that spanned multiple themes. The most common recommendation theme involved training or cross-training (generally focusing on learning what other partners provide), with 45 (54.88%) responses. Having meetings between the partners was the next most common theme (15, 18.29%), followed by information access (11, 13.41%) and communication (7, 8.54%). An additional 11 responses (13.41%) indicated no recommendation (e.g., "N/A" or "No comment").

Comments and Suggestions

There were 83 respondents that provided comments when asked for ways in which DRS could help them perform their job more effectively and efficiently. Suggestions with similar themes were grouped and some respondents provided comments that spanned several themes. The most common response themes were Training (23 respondents, 27.71%), Budget/Staffing (15, 18.07%), Policy Changes (11, 13.25%), Service Provision (11, 13.25%), and Communication (10, 12.05%).

Additional Comments on the Unmet Service Needs of Individuals with Disabilities

There were 38 respondents that provided additional comments which were grouped into major themes. Fourteen responses (36.84%) were related to service provision. The next most common responses were for Transportation (9 respondents, 23.68%), Policy changes (5, 13.16%), and Budget/staffing issues (3, 7.89%). An additional eight responses (21.05%) indicated no topic (e.g., "N/A" or "None").

Discussion

As part of the FY 2018 CSNA, DRS field staff members were surveyed on the VR service needs and gaps for West Virginians with significant disabilities. The responses will be used in conjunction with other CSNA activities to develop the PY 2020-2023 Unified State Plan, including agency goals and priorities, and related strategies. A total of 100 DRS field staff members provided detailed insight into the perceived service needs and gaps throughout the state. The current survey responses echo previous CSNA results, with many of the same service needs and gaps being reported. Overall, the most commonly reported service needs for the FY 2018 CSNA were for Transportation, Overall Training, Job Placement, Psychological/psychiatric services, and Substance Abuse Treatment. Transportation has consistently been the most often reported barrier for West Virginians with significant disabilities. DRS continues to implement and monitor various strategies to improve transportation availability.

Minority Populations

In compliance with the Rehabilitation Act, the survey asked respondents to identify the service needs of individuals from minority backgrounds. The most commonly reported service needs were Transportation, Job Placement, Overall Training, Counseling and Guidance, and Self-Advocacy; the first four services being identical to the top four service needs for minorities from the FY 2015 CSNA.

CRP Services

As required by the WIOA, the survey asked respondents to identify any need for CRP services, including SE. The top reported CRP service needs were Community Based Assessment, Work Skills Assessment, Direct Placement, Work Adjustment Training, and Life Skills Training. In recent years, DRS has adopted goals and priorities to improve access to CRP services. Through successful strategies, DRS now utilizes a statewide network of 80 CRP locations. These CRPs provide valuable services throughout the state, benefiting West Virginians with significant disabilities. Transitioning youth also benefit from CRP services through the provision of pre-employment transition services, including career exploration.

Transitioning Youth (TY)

Respondents were asked to provide the top service needs for TY with significant disabilities. The top five reported service needs for TY were Transportation, Job Exploration Counseling, Work-Based Learning Experiences, Workplace Readiness Training, and Overall Training. DRS will continue to partner with state and local school systems to ensure access to VR and other pre-employment transition services for students with disabilities. Through these partnerships and shared resources, TY will have increased opportunities to achieve competitive, integrated employment.

B. WHO ARE MINORITIES;

In 2018, SPPE staff members, under guidance of the WVSRC-DRS Joint Committee on Needs Assessment, conducted a qualitative analysis of the reported service needs of 1,004 persons with significant disabilities of various age and disability groups statewide.

Of the statewide total of 1,004 persons with significant disabilities at the time of their DRS application, 90 persons were determined to be of minority status. The demographic profile of this subset of minority status individuals with significant disabilities consists of the following characteristics:

Gender: 55.1% male, 44.9% female;

Race: 3.3% American Indian, 2.2% Asian, 75.6% African American, 18.9% Hispanic;

Age: 52.2% under 20 years old, 21.1% 20-34 years, 6.7% 35-44 years, 17.8% 45-64 years, 2.2% 65 years or older; and

Primary Impairment: 6.7% Sensory/Communicative Impairments, 16.7% Physical Impairments, 76.7% Mental Impairments.

As part of the Comprehensive Statewide Needs Assessment, DRS identified the following as the most frequently reported service needs in each of the categories of Education, Training, Health, Employment, and Support, based on the qualitative analysis of the reported service needs of 90 consumers with significant disabilities from minority backgrounds. The approximate percentage of consumers with significant disabilities from minority backgrounds reporting each service need is also listed below.

EDUCATION (21.1%): Other (63.2%); 2-yr or 4-yr College (42.1%); Graduate Degree Education (5.3%).

TRAINING (45.6%): Business/Vocational Training (75.6%); Drive Training/Licensing (14.6%); Job Search Training/Assistance (9.8%); Other Training (4.9%); Career Planning Training (4.9%).

HEALTH (7.7%): Other (57.1%); Psychological/Psychiatric (42.9%); Hearing/Audiological Services (14.3%).

EMPLOYMENT/CRP (77.8%): Job Placement (92.9%); Vocational Counseling and Guidance (7.1%); Other (5.7%); Supported Employment (1.4%); Job Coaching Other Than SE (1.1%).

SUPPORT (8.9%): Financial Assistance (75.0%); Assistive Technology Services (25.0%); Other (12.5%).

AS REPORTED BY DRS FIELD STAFF

Respondents to the DRS field staff survey were asked to identify the top five overall service needs for different consumer groups with which they have experience with providing VR services. Respondents were asked to indicate if they did not have experience working with the consumer group. The number and percentage of respondents who indicated a gap for the service are in parentheses followed by the number of responses by DRS office location. Some respondents identified more than one office.

Note: New categories were created to incorporate answers that were not specific to a pre-existing service category from the survey. For example, the "Overall Training" category was created to include a number of open-ended responses where the respondent indicated a need for training, but not a specific type; for example, "Training options" and "Training services." The Miscellaneous category contains individual responses that were not clear in meaning or otherwise could not be grouped into a particular theme.

Minority Individuals

The survey asked, "From your experience with minority individuals with disabilities, please list the TOP FIVE services that you feel these consumers need in your service area." There were 64 respondents to this question. The most commonly reported service needs were:

Transportation (30, 46.88%) -- Beckley-4, Charleston-3, Elkins-1, Huntington-4, Keyser-2, Lewisburg-2, Marshall-2, Martinsburg-2, Moorefield-1, Morgantown-2, Oak Hill-2, Point Pleasant-2, Princeton-3, Ripley-1, Romney-1, Spencer-1, Summersville-2, Teays Valley-5, Weirton-2, and Welch-1.

Job Placement (17, 26.56%) -- Beckley-1, Charleston-2, Clarksburg-1, Fairmont-1, Huntington-4, Keyser-2, Marshall-1, Martinsburg-2, Moorefield-1, Morgantown-1, Point Pleasant-2, Romney-2, Teays Valley-3, and Welch-1.

Overall Training (16, 25%) -- Beckley-1, Charleston-2, Clarksburg-1, Elkins-1, Fairmont-1, Huntington-1, Keyser-3, Martinsburg-2, Moorefield-2, Morgantown-1, Mullens-1, Point Pleasant-1, Ripley-1, Romney-3, Spencer-1, Teays Valley-1, Weirton-1, Welch-1, and Weston-1.

Counseling and Guidance (11, 17.19%) -- Charleston-4, Clarksburg-2, Fairmont-1, Huntington-2, Keyser-1, Marshall-1, Martinsburg-1, Moorefield-1, Romney-1, Teays Valley-1, and Wheeling-1.

Self-Advocacy (10, 15.63%) -- Clarksburg-3, Huntington-1, Martinsburg-1, Moorefield-1, Morgantown-1, Princeton-1, and Teays Valley-2.

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

IDENTIFYING INDIVIDUALS WITH DISABILITIES WHO HAVE BEEN UNSERVED OR UNDERSERVED BY DRS

As has been the case for many years, DRS' direct client services units located at DRS' Nitro location will continue to be critical for DRS to meet the needs of individuals with disabilities who would otherwise be unserved and/or underserved, including individuals with disabilities who live in the rural part of the State, blind and visually impaired individuals, and the deaf and hard of hearing. The DRS Environmental Modifications Unit provides consumer services to assure they have the highest level of independence in and around their home and work by providing evaluations, technical assistance, and modifications.

According to the 2017 American Community Survey (ACS) 5-Year Estimates (which are the most recent estimates available as of October 1, 2019) there are approximately 122,252 racial minorities (including multi-racial) in West Virginia, making up 6.7% of the state's total population. Since FY 2015, DRS has slightly exceeded this percentage in terms of minority consumers served (8.4%, 8.1%, 8.3%, 8.8%, and 8.7% for FY 2015, FY 2016, FY 2017, FY 2018, and FY 2019, respectively), indicating overall equal access to services.

2017 ACS 5-Year Estimates data reveals that nine counties in West Virginia have minority populations that exceed 3,000: Berkeley (14,229, 12.7% of total county population); Cabell (8,680, 9.0%); Jefferson (6,947, 12.5%); Kanawha (21,557, 11.5%); Marion (3,452, 6.1%); Mercer (5,364, 8.8%); Monongalia (10,424, 10.1%); Raleigh (9,200, 11.9%); and Wood (3,110, 3.6%).

In each year since FY 2015, the DRS minority service percentage has exceeded the county minority population percentage for eight of the nine aforementioned counties: Berkeley, Cabell, Jefferson, Kanawha, Marion, Mercer, Raleigh, and Wood. The DRS minority service percentage was below the county minority population percentage in each year since FY 2015 for Monongalia county. Below is a list of each of these nine counties (with its respective minority population and percentage in parentheses), followed by the DRS minority service percentage for each county in FY 2015, FY 2016, FY 2017, FY 2018, and FY 2019.

Berkeley (14,229, 12.7%): FY 2015 – 18.1%; FY 2016 – 19.4%; FY 2017 – 18.9%; FY 2018 – 14.1%; FY 2019 – 15.0%

Cabell (8,680, 9.0%): FY 2015 – 10.7%; FY 2016 – 11.0%; FY 2017 – 13.0%; FY 2018 – 15.1%; FY 2019 – 14.0%

Jefferson (6,947, 12.5%): FY 2015 – 18.0%; FY 2016 – 13.4%; FY 2017 – 14.0%; FY 2018 – 15.6%; FY 2019 – 16.6%

Kanawha (21,557, 11.5%): FY 2015 – 18.5%; FY 2016 – 16.8%; FY 2017 – 15.6%; FY 2018 – 16.1%; FY 2019 – 15.9%

Marion (3,452, 6.1%): FY 2015 – 9.1%; FY 2016 – 8.1%; FY 2017 – 7.0%; FY 2018 – 10.2%; FY 2019 – 6.4%

Mercer (5,364, 8.8%): FY 2015 – 13.2%; FY 2016 – 14.5%; FY 2017 – 12.3%; FY 2018 – 13.8%; FY 2019 – 15.2%

Monongalia (10,424, 10.1%): FY 2015 – 7.9%; FY 2016 – 7.7%; FY 2017 – 9.5%; FY 2018 – 8.5%; FY 2019 – 7.4%

Raleigh (9,200, 11.9%): FY 2015 – 14.7%; FY 2016 – 13.5%; FY 2017 – 13.2%; FY 2018 – 13.7%; FY 2019 – 13.1%

Wood (3,110, 3.6%): FY 2015 – 6.3%; FY 2016 – 4.9%; FY 2017 – 5.2%; FY 2018 – 5.0%; FY 2019 – 6.0%

In addition, the 2017 ACS 5-Year Estimates data indicated five additional counties in West Virginia with a minority population under 3,000 and a county minority population percentage greater than the State’s minority population percentage of 6.7%: Gilmer (1,484; 17.9%), McDowell (2,132; 10.8%), Ohio (2,930; 6.8%), Preston (2,274; 6.7%), and Summers (968; 7.3%). Of these five counties, only Ohio County had a DRS minority service percentage (8.8% in FY 2015, 9.4% in FY 2016, 9.3% in FY 2017, 10.9% in FY 2018, and 12.6% in FY 2019) consistently higher than its county minority population percentage (6.8%). No minorities were served by DRS in FY 2015 and FY 2016 in Gilmer County. Below is a list of each of these five counties (with its respective minority population and percentage in parentheses), followed by the DRS minority service percentage for each county in FY 2015, FY 2016, FY 2017, FY 2018, and FY 2019.

Gilmer (1,484; 17.9%): FY 2015 – 0.0%; FY 2016 – 0.0%; FY 2017 – 6.3%; FY 2018 – 13.8%; FY 2019 – 14.3%

McDowell (2,132; 10.8%): FY 2015 – 11.4%; FY 2016 – 7.9%; FY 2017 – 6.7%; FY 2018 – 8.9%; FY 2019 – 10.7%

Ohio (2,930; 6.8%): FY 2015 – 8.8%; FY 2016 – 9.4%; FY 2017 – 9.3%; FY 2018 – 10.9%; FY 2019 – 12.6%

Preston (2,274; 6.7%): FY 2015 – 4.4%; FY 2016 – 5.6%; FY 2017 – 6.7%; FY 2018 – 6.5%; FY 2019 – 9.6%

Summers (968; 7.3%): FY 2015 – 3.4%; FY 2016 – 4.8%; FY 2017 – 7.1%; FY 2018 – 8.6%; FY 2019 – 6.5%

To determine potentially underserved areas, the DRS minority service percentage for the five-year period (FY 2015 – FY 2019) for each county was compared to that county’s minority population percentage. Counties with mean DRS minority service percentages that are lower than the minority population percentage are considered to be potentially underserved. Of the 14 aforementioned counties, only 5 counties met this criterion: Gilmer, McDowell, Monongalia, Preston, and Summers counties.

DRS utilized geographic information systems (GIS) to pinpoint potential underserved zip codes in Gilmer, McDowell, Monongalia, Preston, and Summers counties. Zip codes that meet two criteria are identified as potential underserved areas: (1) the zip code has a minority population greater than or equal to 50 and (2) there are 10 or fewer minority consumers (as of October, 2019) reported in the agency’s database over the last four fiscal years. Applying these criteria reveals 11 potentially underserved zip codes; 1 in Gilmer County (Sand Fork), 2 in McDowell County (Big Sandy and Maybeury), 2 in Monongalia County (Granville and Osage), 4 in Preston County (Albright, Bruceton Mills, Kingwood, and Terra Alta), and 2 in Summers County (Hinton and Pipestem). DRS will pursue outreach efforts in these zip codes to market and expand VR services to individuals with disabilities from minority backgrounds.

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

FISCAL YEAR 2018 COMPREHENSIVE STATEWIDE NEEDS ASSESSMENT OF THE WEST VIRGINIA WORKFORCE DEVELOPMENT SYSTEM

Introduction

One requirement of the CSNA is an assessment of the rehabilitation needs of individuals with disabilities served through other components of the statewide workforce development system. In West Virginia, this system is overseen at the state level by the State Workforce Development Board (WDB) and the Interagency Collaborative Team (ICT) and locally by seven Local Workforce Development Boards (LWDBs) that preside over localized workforce development system activities. The State and Local WDBs are comprised of representatives from business, labor, and public agencies. The ICT comprises eight state partner agencies that encompass the WV workforce development system. The purpose of the ICT is to foster cooperation and coordination of services among partner agencies.

American Job Centers are physical locations where consumers, including those with disabilities, can utilize services provided by partner agencies operating under the Workforce Innovation and Opportunity Act. WorkForce West Virginia (WFWV) is the agency within the West Virginia Department of Commerce that operates American Job Centers in the seven workforce development regions across the state. DRS' involvement in the State WDB, ICT, and LWDBs in addition to its presence at American Job Centers ensures that people with disabilities are considered as employment training needs and services are identified.

Comprehensive Statewide Needs Assessment

To assess the rehabilitation needs of individuals with disabilities in West Virginia, DRS utilizes a multifaceted, broad approach. This report only covers a single activity and targeted population within the overall comprehensive statewide needs assessment – the rehabilitation needs of individuals served through other components of the statewide workforce development system. This report provides a brief overview of service availability via physical American Job Center locations followed by the results of a survey provided to all members of the ICT, including the directors of all LWDBs.

American Job Center Types and Locations

As of October 2019, there are 35 American Job Center (AJC) locations including 13 comprehensive and 22 affiliate centers. Based on the federal regulations at 20 CFR §678.305 and §678.310, the two types of centers are defined based on the following criteria:

1. **Comprehensive AJC** – A comprehensive AJC is a physical location where job seeker and employer customers can access the programs, services, and activities of all required AJC partners. A comprehensive AJC must have at least one title I staff person physically present. The comprehensive AJC must provide career services, access to training services, access to employment and training activities carried out under sec. 134(d) of WIOA, access to programs and activities carried out by AJC partners listed in 678.400 through 678.410, including the Employment Service program authorized under the Wagner-Peyser Act, and workforce and labor market information.
2. **Affiliate Site** – An affiliated site is a site that makes available to job seekers and employers one or more of the AJC partners' programs, services, and activities. An affiliated site does not need to provide access to every required AJC partner program. The frequency of program staff's physical presence in the affiliated site will be determined at the local level. Affiliated sites are access points in addition to the

comprehensive one-stop center(s) in each local area. If used by local areas as a part of the service delivery strategy, affiliate sites must be implemented in a manner that supplements and enhances customer access to services.

Please note that there are seven workforce development regions in West Virginia, whereas DRS has six regions. The following provides the breakdown of American Job Centers by type and workforce development region:

- Region One consists of five comprehensive centers and four affiliate centers. The LWDB oversees service delivery in 11 counties of southeastern West Virginia: Fayette, Greenbrier, McDowell, Mercer, Monroe, Nicholas, Pocahontas, Raleigh, Summers, Webster, and Wyoming. The region is mountainous and rural in nature. The coal industry continues to experience a large number of dislocations throughout the region as well as the closure of several chain retail stores. Training services are being utilized to assist many citizens in the local areas to retrain in new career pathways. Industry expected growth in the area includes, but is not limited to: Administrative/Support Services, Construction, Health Care and Social Services, Wood Product Manufacturing, and Professional Services.
- Region Two consists of one comprehensive center located in Huntington and eight affiliate sites including four Community and Technical College (CTC) sites. The affiliate sites provide WIOA services and Temporary Assistance for Needy families (TANF) services in all locations. There are seven counties that make up the region: Putnam, Cabell, Mingo, Logan, Lincoln, Boone and Wayne.
- Region Three consists of one comprehensive center serving the citizens of Kanawha County including dislocated workers, adults, and youth. Staff arrange to go to other locations to provide services based upon need. Kanawha County is mostly urban but has a significant outlying rural population.
- Region Four is served by one comprehensive center and six affiliate centers. It consists of nine counties that comprises a region of rural and urban populations: Calhoun, Clay, Jackson, Mason, Pleasants, Ritchie, Roane, Wirt, and Wood. The region is supported by a variety of industries including Health Care, Plastics/Polymers, Professional Services, Warehousing, Transportation, Oil and Gas, and Construction. Government employment at the federal, state, and local levels also employ a considerable number of the region's citizens
- Region Five consists of two comprehensive centers and one affiliate center. Six counties comprise the area overseen by the LWDB: Brooke, Hancock, Marshall, Ohio, Tyler, and Wetzel. The region is bounded by the Ohio River on the north and west and the state of Pennsylvania on the east.
- Region Six consists of one comprehensive center and three affiliate centers that serve 13 counties in North Central West Virginia: Barbour, Braxton, Doddridge, Gilmer, Harrison, Lewis, Marion, Monongalia, Preston, Randolph, Taylor, Tucker, and Upshur. The region's location along the I-79 corridor is advantageous.
- Region Seven consists of two comprehensive centers. Eight counties are served by the LWDB: Morgan, Berkeley, Jefferson, Grant, Hardy, Hampshire, Mineral, and Pendleton. The region offers a contrast of the rural in western counties and fast-paced suburban sprawl of the eastern counties, part of the Washington D.C. Metropolitan Statistical Area.

SURVEY OF ICT MEMBERS

In June 2018, DRS emailed a survey to all members of the ICT. At the time of the survey, in addition to the seven regional WDB directors, ICT membership included the following WV state agencies:

- Bureau of Senior Services
- State Unit on Aging
- Council for Community and Technical College
- Department of Education
- Adult Education and Literacy Activities
- Postsecondary Vocational Education
- Office of Institutional Programs
- Department of Commerce
- DRS
- WorkForce WV
- WV Employment Service
- Development Office
- Community Development Division
- Business Industry Development
- Department of Health and Human Resources
- Bureau of Children and Families
- Temporary Assistance for Needy Families
- Food Stamp Employment and Training
- Department of Military Affairs and Public Safety
- Division of Corrections

Survey

The survey consisted of seven questions to collect information about the respondent, the agency they represent, and their perception of the rehabilitation service needs and gaps of the individuals with significant disabilities that they serve. The questions were as follows:

- Name
- Title
- Agency
- Approximately how many consumers with significant disabilities are served by your agency per year?

- Please identify the vocational rehabilitation services most often needed by consumers with significant disabilities served by your agency (up to five services).
- Please identify any vocational rehabilitation service gaps (i.e., services that are needed, but not available in sufficient quantities, if at all) for consumers with significant disabilities served by your agency (up to five services).
- How can DRS assist your agency to better serve your consumers with significant disabilities? Please add any additional comments you wish to provide.

Results

Six surveys were returned via email. Respondents represented WorkForce WV, the Bureau of Senior Services, West Virginia Adult Education, and WDB Regions 2, 3, and 5.

Number of Individuals with Disabilities Served

The approximate number of consumers with disabilities served by each agency varied greatly, from 1 to over 26,000. One respondent was unable to provide this information.

Services Most Often Needed

Six respondents provided service-need information. The most commonly reported service needs were transportation, education/training, soft skills training, assessment for accommodations, and job placement.

Service Gaps

Four respondents provided service gap information. The responses included access to services, assessment for learning disabilities, transportation, assistance with training and related costs, job coaching, youth services, and rehabilitation technology.

DRS Assistance and Additional Comments

Respondents indicated a desire for continued cross training and collaboration, more outreach to potentially eligible individuals, and making cross referrals.

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

RESULTS OF THE ANALYSIS OF THE REPORTED PRE-EMPLOYMENT TRANSITION SERVICE NEEDS OF STUDENTS WITH DISABILITIES

SPPE staff members in 2018, under guidance of the WV SRC-DRS Joint Committee on Needs Assessment, conducted a qualitative analysis of the reported service needs of 1,004 persons with significant disabilities of various age and disability groups statewide. These individuals represent a good sample of consumers with significant disabilities that will continue to seek assistance from agencies in coming years, *ceteris paribus*. All 55 counties in West Virginia were represented in the sample. SPPE staff members separately analyzed the needs comments of the 449 students with disabilities included in the sample. The needs comments were analyzed and grouped based on their indication or implication of need of one or more of five required Pre-ETS:

- Job exploration counseling;

- Work-based learning experiences, which may include in-school or after school opportunities, or experience outside the traditional school setting (including internships), that is provided in an integrated environment to the maximum extent possible;
- 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, which may include peer mentoring.

The demographic profile of these 449 students with disabilities consists of the following characteristics:

Gender: 50.6% male, 49.4% female;

Race: 92.9% White, 6.9% Other (African American/Hispanic/American Indian/Native Hawaiian/Asian), 0.2% Unspecified;

Age: 96.9% under 20 years old, 3.1% 20-34 years; and

Primary Impairment: 4.9% Sensory/Communicative Impairments, 10.9% Physical Impairments, 84.2% Mental Impairments.

Of the 449 students with disabilities providing needs comments, 106 (23.6%) indicated or implied a need for one or more Pre-ETS.

As part of the Comprehensive Statewide Needs Assessment, the following report presents the results of the qualitative analysis on the needs comments of these 106 students with disabilities who indicated or implied a need for one or more Pre-ETS.

Job Exploration Counseling (72, 67.9%); Counseling on Opportunities for Enrollment in Comprehensive Transition or Postsecondary Educational Programs (13, 12.3); Work-Based Learning Experiences (6, 5.7%); Instruction in Self-Advocacy (2, 1.9%); and Workplace Readiness Training (1, 0.9%).

AS REPORTED BY DRS FIELD STAFF

WIOA requires that the comprehensive statewide needs assessment include an assessment of the vocational rehabilitation service needs of “youth with disabilities, and students with disabilities, including their need for pre-employment transition services.” DRS field staff that serve transitioning youth are one key resource in identifying the service needs of youth with disabilities in West Virginia. Therefore, needs assessment surveys completed by 100 DRS field staff were analyzed in order to identify students’ needs for Pre-ETS.

Respondents

There were 34 respondents, 34% of the 100, that indicated having a primary caseload of School/Transition. However, a number of field staff have a secondary caseload of School/Transition. In total, 77 field staff (77%) reported regarding needs for at least one Pre-ETS category. This number includes 37 field staff (37%) who also reported a service gap for at least one Pre-ETS category. The breakdown of these 77 respondents by position is as follows:

Rehabilitation Counselor Trainee, 12 respondents (15.6%)

Rehabilitation Counselor, 60 respondents (77.9%)

Senior Rehabilitation Counselor, 28 respondents (36.4%)
Certified Rehabilitation Counselor, 13 respondents (16.9%)
Branch Office Manager/Supervisor, 17 respondents (22.1%)
District Manager, 6 respondents (7.8%)
Rehabilitation Services Associate, 13 respondents (16.9%)

Note: Percentages do not total 100%, because staff were instructed to indicate previous positions as well as current positions.

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Respondents were from 25 branch office locations, with some respondents indicating more than one office (typically managers). The Parkersburg and New Martinsville offices were the only locations not represented by the Pre-ETS respondents. The total number of respondents by district and office location are as follows:

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District 2 (18) — Clarksburg-7, Elkins-4, Morgantown-4, Fairmont-3, Weston-3.

District 3 (6) — Parkersburg-0, New Martinsville-0, Weirton-5, Wheeling-1.

District 4 (8) — Beckley-2, Lewisburg-2, Oak Hill-2, Princeton-5, Summersville-5.

District 5 (10) — Huntington-7, Logan-1, Mullens-1, Welch-1.

District 6 (14) — Keyser-8, Martinsburg-6, Moorefield-7, Romney-6.

Pre-ETS Needs and Gaps

Within the survey, each service was accompanied by checkboxes in two columns: Need and Gap. Respondents were asked to “please indicate whether most of the consumers you serve in your area can benefit from the service” by placing an ‘X’ in the Need column for that service. Additionally, respondents were asked to “indicate whether you feel there is a service gap (i.e., services are needed, but not available in sufficient quantities) for each service by placing an ‘X’ in the Gap column.”

Service need/use for each Pre-ETS category was assessed to allow respondents to indicate which services their consumers need/use most often. This was done independently of the service gap assessment as some services may be highly needed/used but are readily available and therefore do not require an increase in availability.

Pre-ETS categories are listed below with the percentage of respondents indicating need in parentheses:

Job Exploration Counseling (72%)
Counseling on Postsecondary Opportunities (72%)
Workplace Readiness Training (69%)
Work-Based Learning Experiences (66%)
Self-Advocacy Training (64%)

Respondents that indicated a perceived service gap were totaled for each service. The number and percentage of respondents who reported a gap for the service are in parentheses followed by the number of responses by DRS office location. Some respondents identified more than one office.

Work-Based Learning Experiences (25, 25%) -- Charleston-4, Clarksburg-1, Elkins-2, Huntington-3, Keyser-2, Logan-1, Martinsburg-3, Moorefield-3, Mullens-1, Point Pleasant-1, Romney-2, Spencer-1, Summersville-2, Weirton-3, Welch-1, and Weston-1.

Workplace Readiness Training (25, 25%) -- Charleston-3, Clarksburg-1, Elkins-4, Huntington-2, Keyser-2, Logan-1, Martinsburg-2, Moorefield-2, Mullens-1, Point Pleasant-1, Princeton-1, Romney-2, Spencer-1, Summersville-1, Weirton-1, Welch-1, and Weston-3.

Self-Advocacy Training (19, 19%) -- Charleston-4, Clarksburg-1, Elkins-2, Huntington-2, Keyser-2, Logan-1, Martinsburg-1, Moorefield-1, Point Pleasant-1, Princeton-1, Romney-2, Spencer-1, Summersville-2, Teays Valley-1, and Weston-1.

Job Exploration Counseling (13, 13%) -- Charleston-3, Clarksburg-1, Elkins-2, Huntington-2, Logan-1, Martinsburg-1, Point Pleasant-1, Spencer-1, Summersville-1, and Weston-1.

Counseling on Postsecondary Opportunities (12, 12%) -- Charleston-3, Elkins-2, Huntington-2, Logan-1, Martinsburg-1, Moorefield-1, Ripley-1, Spencer-1, Summersville-1, and Weston-1.

Overall Service Needs for West Virginians with Disabilities

Respondents were asked to identify the top five overall service needs for different consumer groups with which they have experience with providing VR services. Respondents were asked to indicate if they did not have experience working with the consumer group. The number and percentage of respondents who indicated a gap for the service are in parentheses followed by the number of responses by DRS office location. Some respondents identified more than one office.

Note: New categories created to incorporate answers that were not specific to a pre-existing service category from the survey. For example, the "Overall Training" category was created to include a number of open-ended responses where the respondent indicated a need for training, but not a specific type; for example, "Training options" and "Training services." The Miscellaneous category contains individual responses that were not clear in meaning or otherwise could not be grouped into a particular theme.

Transitioning Youth

The survey asked, "From your experience with transitioning youth with disabilities, please list the TOP FIVE services that you feel these consumers need in your service area." There were 74 respondents to this question. The most commonly reported service needs were:

Transportation (38, 51.4%) -- Beckley-3, Charleston-2, Clarksburg-3, Elkins-1, Fairmont-1, Huntington-2, Keyser-3, Lewisburg-2, Marshall-1, Martinsburg-3, Moorefield-1, Morgantown-4, Mullens-1, Oak Hill-2, Point Pleasant-2, Princeton-5, Ripley-1, Romney-3, Spencer-2, Summersville-5, Teays Valley-2, Weirton-4, and Wheeling-1.

Job Exploration Counseling (26, 35.1%) -- Charleston-4, Clarksburg-4, Elkins-3, Fairmont-2, Huntington-3, Keyser-1, Martinsburg-1, Moorefield-1, Point Pleasant-2, Romney-1, Summersville-1, Teays Valley-3, Weirton-1, and Weston-2.

Work-Based Learning Experiences (23, 31.1%) -- Beckley-1, Charleston-1, Clarksburg-6, Fairmont- 3, Huntington-1, Keyser-2, Lewisburg-1, Logan-1, Martinsburg-2, Moorefield-4, Oak Hill-1, Point Pleasant-1, Princeton-3, Romney-2, Summersville-2, Teays Valley-1, Weirton-1, and Welch-1.

Workplace Readiness Training (16, 21.6%) -- Charleston-1, Clarksburg-2, Elkins-1, Fairmont-1, Keyser-2, Martinsburg-3, Moorefield-4, Morgantown-1, Point Pleasant-1, Princeton-1, Romney-2, Teays Valley-2, Welch-1, and Weston-2.

Overall Training (15, 20.3%) -- Charleston-3, Elkins-2, Fairmont-2, Keyser-1, Mullens-1, Point Pleasant-1, Princeton-1, Ripley-1, Spencer-2, Summersville-1, Teays Valley-2, and Weston-1.

RESULTS OF THE ANALYSIS OF THE REPORTED PRE-EMPLOYMENT TRANSITION SERVICES PROVISION BY WEST VIRGINIA HIGH SCHOOLS TO STUDENTS WITH DISABILITIES

In November 2019, as part of the Comprehensive Statewide Needs Assessment, DRS conducted an assessment of the need and availability of Pre-ETS for students with disabilities at high schools across the state. The five required Pre-ETS activities (as mandated by WIOA) for students with disabilities are:

1. Job exploration counseling
2. Work-based learning experiences
3. Counseling on opportunities for transitioning from school to work or into postsecondary training or education programs, including college, university (Counseling on Postsecondary Opportunities)
4. Workplace readiness training to develop social skills and independent living skills
5. Instruction in self-advocacy

To assess the availability of Pre-ETS for students with disabilities at high schools, DRS counselors held formal meetings with school principals, vice principals, counselors, special education teachers, and other related staff. During these meetings, DRS counselors asked school staff, for each of the five required Pre-ETS activities, whether the service was currently available to the school's students with disabilities and if so, how the service was provided.

The SPPE Unit rated each of the responses to the five Pre-ETS questions using a 1-3 Likert scale.

A rating of 1 indicated that the school does not provide the service (or has a very limited capacity) to its students with disabilities. A rating of 2 indicated that the school was providing services to some students with disabilities but not all, or by providing a minimal level of service to all students with disabilities, suggesting remaining unmet need/demand. Finally, a rating of 3 indicates that the school was sufficiently providing the service to its students with disabilities.

Results

In total, 110 high schools from 54 of the 55 counties participated. No schools from Jefferson County participated, despite requests. All six DRS districts were represented.

Total scores for each school's responses were calculated by adding the scores for each required Pre-ETS activity. A total score of 5 would indicate that none of the services were being provided by the school, while a total score of 15 would indicate that all five required activities of Pre-ETS were provided sufficiently by the school. One school had a total score of 5 (Morgantown) and no

school had a total score of 15. Total scores ranged from 5 to 13, with a mean of 9.8 and a mode of 10.

For each service, statewide average scores were calculated, ranging from 1 (indicating no provision of service in high schools across the state) to 3 (indicating sufficient service provision by all high schools in the state). The most sufficiently provided Pre-ETS statewide was Counseling on Post- Secondary Opportunities (2.15), followed by Job Exploration Counseling (2.11), Work Based Learning Experiences (2.04), Workplace Readiness Training (1.88) and Instruction in Self-Advocacy (1.66). Across all five Pre-ETS categories, the statewide average score was 1.97.

Across all five required Pre-ETS activities statewide, a rating of 1 was scored for a total of 106 responses (Job Exploration Counseling – 16; Work Based Learning Experiences – 10; Counseling on Postsecondary Opportunities – 19; Workplace Readiness Training – 20; and Instruction in Self Advocacy – 41), a rating of 2 was scored for a total of 356 responses (Job Exploration Counseling – 66; Work Based Learning Experiences – 86; Counseling on Postsecondary Opportunities – 56; Workplace Readiness Training – 83; and Instruction in Self Advocacy – 65), and a rating of 3 was scored for a total of 88 responses (Job Exploration Counseling – 28; Work Based Learning Experiences – 14; Counseling on Postsecondary Opportunities – 35; Workplace Readiness Training – 7; and Instruction in Self Advocacy – 4).

The results of the survey indicate that most high schools in West Virginia are providing some level of required Pre-ETS activity. However, there are locations within the state in which Pre-ETS are not provided or are provided minimally by the school. To ensure that Pre-ETS are available to students with disabilities in high schools statewide, as well as eliminate duplication of services, DRS will prioritize and emphasize Pre-ETS provision in categories and high schools which were rated as 1, with secondary priority to those high schools and Pre-ETS categories which were rated as 2. Additionally, DRS will continue to explore and expand options for Pre-ETS provision and best practices statewide.

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

As described above, DRS' direct client services units located at DRS' Nitro location will continue to be critical for DRS to meet the needs of individuals with disabilities identified under the unserved and underserved portion of this assessment, including individuals with disabilities who live in the rural part of the State, blind and visually impaired individuals, and the deaf and hard of hearing. The DRS Environmental Modifications Unit provides consumer services to assure they have the highest level of independence in and around their home and work by providing evaluations, technical assistance, and modifications. The continual maintenance and improvement of direct client services units located at DRS' Nitro location will be necessary to maintain its operation in the most efficient and cost-effective manner possible.

RESULTS FROM THE SURVEY OF CRPS/CSPS

DRS conducted a survey of CRPs/community service providers (CSPs) with acknowledged vendor status to provide services (including supported-employment services) to DRS consumers across the state. The survey was conducted as a part of the statewide comprehensive needs assessment study of persons with significant disabilities in West Virginia.

DRS distributed the survey via email to 62 DRS-acknowledged CRPs/CSPs to collect input on their provision of services to West Virginians with significant disabilities, their level of communication with DRS, ways in which DRS could improve services or service delivery, and

what the CRPs/CSPs urgently needed to better serve West Virginians with significant disabilities. Forty surveys were returned to DRS, for a response rate of 64.5 percent. Surveys were returned from CRPs/CSPs working with DRS offices across the state.

Service Provision

In each of the six DRS districts, all nine categories of services were reported as being provided. Services were also reported as being provided in all 55 counties in West Virginia, with the exception of Pendleton and Clay counties. All nine services were reported as being provided in 43 out of 55 counties (78.2%). Excluding the two unreported counties (i.e., Pendleton and Clay), the remaining counties were reported to be provided with between four and eight CRP services. Additionally, in several counties, various services were reported as provided by multiple CRPs. However, based on records in the DRS CRP directory, all nine categories of CRP services are provided in all 55 counties.

Communication and Liaison Contact

Thirty-nine out of 40 CRPs (97.5%) provided a rating of their communication with DRS. Options ranged from Excellent to Very Poor. One CRP gave a rating of Very Poor and 34 of the 39 CRPs (87.2%) gave a response of Good or better. When asked whether a DRS liaison counselor was in contact on a regular basis, 29 of 37 CRPs responded yes, while 8 CRPs responded no (78.4% and 21.6%, respectively). Three CRPs did not respond to this question.

DRS Improvement

Thirty-six of the 40 CRPs gave comments regarding specific things that DRS could do to improve services or service delivery. The most common theme found in the comments was that of outreach, including outreach to high schools and businesses. Another common theme involved improvements in communication, including frequency and quality of communication. The increased frequency of communication included recommendations of regular meetings and training sessions with DRS staff (e.g., “...Regularly scheduled local meetings with DRS and the CRP would enable us to discuss clients, problems, solutions more in depth....”). Perhaps related to the theme of communication was a theme of consistency. Some CRPs expressed issues with the consistency in the way different counselors handle solutions (e.g., “...each DRS Counselor wants services done differently and documents completed and submitted differently making the process rather confusing.”).

CRP/CSP Needs

Thirty-four of the 40 CRPs gave comments on what the CRP urgently needed to better serve West Virginians with disabilities. Funding and referrals (which generate funding for CRPs) were, by far, the most reported needs. Funding need comments ranged from the convenient (e.g., “A consistent stream of referrals would make it possible for us to recruit and employ job coaches....”) to the necessary (e.g., “[CRP name] needs more referrals to continue providing quality VR services....”) As seen in these examples, the CRPs reasons for funding needs also ranged from general to specific.

Other, less commonly addressed themes that could be found in the comments included needs for more transportation help and better relationships with employers to facilitate placement. Other topics were mentioned as well, and some comments merely stated that there were no pressing needs at this time.

Conclusions Based on the Survey of CRPs/CSPs

No less than four services were reported by CRPs, as being provided in each of West Virginia's counties, with the exceptions of Pendleton and Clay counties. According to DRS' records of CRP information, Pendleton County is served by four CRPs and Clay County is served by five CRPs. Only one of these CRPs responded to the survey but did not indicate serving either county in the survey, which is discrepant from DRS records. Despite this deficiency, all nine CRP services were reported as being provided in all six DRS districts and three-fourths of all West Virginia counties.

Over 85% of CRPs reported a Good or better rating of communication with DRS and only one CRP rated communication with DRS as being Very Poor. This is somewhat contradictory with the fact that only 78.4% of the CRPs claimed that a DRS liaison counselor was in contact on a regular basis. This raises the slightly counter-intuitive idea that communication does not have to be frequent, or even regularly occurring, in order to be good. Comments regarding communication (which were provided by nearly all of the respondents) reflected this at times, suggesting that communication was good when it occurred. At other times, comments indicated that the lack of regular communication was indeed a problem.

Comments on DRS improvement focused on outreach, improved communication, and consistency among DRS counselors' requests. Comments on CRP needs generally emphasized funding and referrals, requesting that DRS continue to provide (or provide more of) each. This is only logical, as CRPs require these things to remain in existence. Some CRPs, though, made it clear that funding from DRS specifically allows them to provide the services that they provide.

CRP SERVICE RESPONSES FROM DRS FIELD STAFF SURVEY

The five most commonly reported gaps for employment/CRP services were:

Vocational Evaluation (37, 37%) -- Beckley-2, Charleston-7, Clarksburg-3, Elkins-2, Fairmont-1, Huntington-7, Keyser-5, Lewisburg-1, Logan-1, Marshall-1, Martinsburg-2, Moorefield-2, Oak Hill-1, Point Pleasant-2, Princeton-1, Romney-3, Summersville-2, Teays Valley-1, Weirton-4, and Weston- 1.

Job Placement (31, 31%) -- Beckley-2, Charleston-4, Clarksburg-2, Elkins-2, Huntington-3, Keyser- 4, Lewisburg-1, Logan-2, Marshall-1, Martinsburg-2, Moorefield-1, Oak Hill-1, Point Pleasant-2, Princeton-1, Romney-2, Summersville-2, Teays Valley-2, Weirton-3, Welch-2, and Weston-1.

Job Development (28, 28%) -- Beckley-2, Charleston-5, Elkins-4, Huntington-3, Keyser-4, Lewisburg-1, Marshall-1, Martinsburg-2, Moorefield-1, Oak Hill-1, Point Pleasant-1, Princeton-3, Romney-2, Summersville-2, Teays Valley-1, Weirton-3, and Weston-2.

Trial Work Experience (25, 25%) -- Beckley-1, Charleston-4, Elkins-3, Fairmont-2, Huntington-3, Keyser-2, Lewisburg-1, Logan-1, Martinsburg-1, Oak Hill-1, Point Pleasant-2, Princeton-2, Romney- 2, Summersville-2, Weirton-4, Welch-1, and Weston-2.

Extended Supported Employment Services (24, 24%) -- Charleston-2, Elkins-2, Huntington-5, Keyser-4, Logan-1, Marshall-1, Martinsburg-1, Point Pleasant-2, Princeton-1, Ripley-1, Romney-2, Spencer-1, Summersville-2, Weirton-3, and Weston-1.

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

RESULTS OF THE ANALYSIS OF THE REPORTED PRE-EMPLOYMENT TRANSITION SERVICE NEEDS OF STUDENTS WITH DISABILITIES

SPPE staff members in 2018, under guidance of the WV SRC-DRS Joint Committee on Needs Assessment, conducted a qualitative analysis of the reported service needs of 1,004 persons with significant disabilities of various age and disability groups statewide. These individuals represent a good sample of consumers with significant disabilities that will continue to seek assistance from agencies in coming years, *ceteris paribus*. All 55 counties in West Virginia were represented in the sample. SPPE staff members separately analyzed the needs comments of the 449 students with disabilities included in the sample. The needs comments were analyzed and grouped based on their indication or implication of need of one or more of five required Pre-ETS:

- Job exploration counseling;
- Work-based learning experiences, which may include in-school or after school opportunities, or experience outside the traditional school setting (including internships), that is provided in an integrated environment to the maximum extent possible;
- 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, which may include peer mentoring.

The demographic profile of these 449 students with disabilities consists of the following characteristics:

Gender: 50.6% male, 49.4% female;

Race: 92.9% White, 6.9% Other (African American/Hispanic/American Indian/Native Hawaiian/Asian), 0.2% Unspecified;

Age: 96.9% under 20 years old, 3.1% 20-34 years; and

Primary Impairment: 4.9% Sensory/Communicative Impairments, 10.9% Physical Impairments, 84.2% Mental Impairments.

Of the 449 students with disabilities providing needs comments, 106 (23.6%) indicated or implied a need for one or more Pre-ETS.

As part of the Comprehensive Statewide Needs Assessment, the following report presents the results of the qualitative analysis on the needs comments of these 106 students with disabilities who indicated or implied a need for one or more Pre-ETS.

Job Exploration Counseling (72, 67.9%); Counseling on Opportunities for Enrollment in Comprehensive Transition or Postsecondary Educational Programs (13, 12.3); Work-Based Learning Experiences (6, 5.7%); Instruction in Self-Advocacy (2, 1.9%); and Workplace Readiness Training (1, 0.9%).

AS REPORTED BY DRS FIELD STAFF

WIOA requires that the comprehensive statewide needs assessment include an assessment of the vocational rehabilitation service needs of "youth with disabilities, and students with disabilities, including their need for pre-employment transition services." DRS field staff that serve transitioning youth are one key resource in identifying the service needs of youth with

disabilities in West Virginia. Therefore, needs assessment surveys completed by 100 DRS field staff were analyzed in order to identify students' needs for Pre-ETS.

Respondents

There were 34 respondents, 34% of the 100, that indicated having a primary caseload of School/Transition. However, a number of field staff have a secondary caseload of School/Transition. In total, 77 field staff (77%) reported regarding needs for at least one Pre-ETS category. This number includes 37 field staff (37%) who also reported a service gap for at least one Pre-ETS category. The breakdown of these 77 respondents by position is as follows:

Rehabilitation Counselor Trainee, 12 respondents (15.6%)

Rehabilitation Counselor, 60 respondents (77.9%)

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Certified Rehabilitation Counselor, 13 respondents (16.9%)

Branch Office Manager/Supervisor, 17 respondents (22.1%)

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Respondents were from 25 branch office locations, with some respondents indicating more than one office (typically managers). The Parkersburg and New Martinsville offices were the only locations not represented by the Pre-ETS respondents. The total number of respondents by district and office location are as follows:

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Pre-ETS Needs and Gaps

Within the survey, each service was accompanied by checkboxes in two columns: Need and Gap. Respondents were asked to "please indicate whether most of the consumers you serve in your area can benefit from the service" by placing an 'X' in the Need column for that service. Additionally, respondents were asked to "indicate whether you feel there is a service gap (i.e., services are needed, but not available in sufficient quantities) for each service by placing an 'X' in the Gap column."

Service need/use for each Pre-ETS category was assessed to allow respondents to indicate which services their consumers need/use most often. This was done independently of the service gap assessment as some services may be highly needed/used but are readily available and therefore do not require an increase in availability.

Pre-ETS categories are listed below with the percentage of respondents indicating need in parentheses:

Job Exploration Counseling (72%)

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Respondents that indicated a perceived service gap were totaled for each service. The number and percentage of respondents who reported a gap for the service are in parentheses followed by the number of responses by DRS office location. Some respondents identified more than one office.

Work-Based Learning Experiences (25, 25%) -- Charleston-4, Clarksburg-1, Elkins-2, Huntington-3, Keyser-2, Logan-1, Martinsburg-3, Moorefield-3, Mullens-1, Point Pleasant-1, Romney-2, Spencer-1, Summersville-2, Weirton-3, Welch-1, and Weston-1.

Workplace Readiness Training (25, 25%) -- Charleston-3, Clarksburg-1, Elkins-4, Huntington-2, Keyser-2, Logan-1, Martinsburg-2, Moorefield-2, Mullens-1, Point Pleasant-1, Princeton-1, Romney- 2, Spencer-1, Summersville-1, Weirton-1, Welch-1, and Weston-3.

Self-Advocacy Training (19, 19%) -- Charleston-4, Clarksburg-1, Elkins-2, Huntington-2, Keyser-2, Logan-1, Martinsburg-1, Moorefield-1, Point Pleasant-1, Princeton-1, Romney-2, Spencer-1, Summersville-2, Teays Valley-1, and Weston-1.

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Overall Service Needs for West Virginians with Disabilities

Respondents were asked to identify the top five overall service needs for different consumer groups with which they have experience with providing VR services. Respondents were asked to indicate if they did not have experience working with the consumer group. The number and percentage of respondents who indicated a gap for the service are in parentheses followed by the number of responses by DRS office location. Some respondents identified more than one office.

Note: New categories created to incorporate answers that were not specific to a pre-existing service category from the survey. For example, the "Overall Training" category was created to include a number of open-ended responses where the respondent indicated a need for training, but not a specific type; for example, "Training options" and "Training services." The Miscellaneous category contains individual responses that were not clear in meaning or otherwise could not be grouped into a particular theme.

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The survey asked, "From your experience with transitioning youth with disabilities, please list the TOP FIVE services that you feel these consumers need in your service area." There were 74 respondents to this question. The most commonly reported service needs were:

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Job Exploration Counseling (26, 35.1%) -- Charleston-4, Clarksburg-4, Elkins-3, Fairmont-2, Huntington-3, Keyser-1, Martinsburg-1, Moorefield-1, Point Pleasant-2, Romney-1, Summersville-1, Teays Valley-3, Weirton-1, and Weston-2.

Work-Based Learning Experiences (23, 31.1%) -- Beckley-1, Charleston-1, Clarksburg-6, Fairmont- 3, Huntington-1, Keyser-2, Lewisburg-1, Logan-1, Martinsburg-2, Moorefield-4, Oak Hill-1, Point Pleasant-1, Princeton-3, Romney-2, Summersville-2, Teays Valley-1, Weirton-1, and Welch-1.

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Overall Training (15, 20.3%) -- Charleston-3, Elkins-2, Fairmont-2, Keyser-1, Mullens-1, Point Pleasant-1, Princeton-1, Ripley-1, Spencer-2, Summersville-1, Teays Valley-2, and Weston-1.

RESULTS OF THE ANALYSIS OF THE REPORTED PRE-EMPLOYMENT TRANSITION SERVICES PROVISION BY WEST VIRGINIA HIGH SCHOOLS TO STUDENTS WITH DISABILITIES

In November 2019, as part of the Comprehensive Statewide Needs Assessment, DRS conducted an assessment of the need and availability of Pre-ETS for students with disabilities at high schools across the state. The five required Pre-ETS activities (as mandated by WIOA) for students with disabilities are:

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4. Workplace readiness training to develop social skills and independent living skills
5. Instruction in self-advocacy

To assess the availability of Pre-ETS for students with disabilities at high schools, DRS counselors held formal meetings with school principals, vice principals, counselors, special education teachers, and other related staff. During these meetings, DRS counselors asked school staff, for each of the five required Pre-ETS activities, whether the service was currently available to the school's students with disabilities and if so, how the service was provided.

The SPPE Unit rated each of the responses to the five Pre-ETS questions using a 1-3 Likert scale. A rating of 1 indicated that the school does not provide the service (or has a very limited capacity) to its students with disabilities. A rating of 2 indicated that the school was providing

services to some students with disabilities but not all, or by providing a minimal level of service to all students with disabilities, suggesting remaining unmet need/demand. Finally, a rating of 3 indicates that the school was sufficiently providing the service to its students with disabilities.

Results

In total, 110 high schools from 54 of the 55 counties participated. No schools from Jefferson County participated, despite requests. All six DRS districts were represented.

Total scores for each school's responses were calculated by adding the scores for each required Pre-ETS activity. A total score of 5 would indicate that none of the services were being provided by the school, while a total score of 15 would indicate that all five required activities of Pre-ETS were provided sufficiently by the school. One school had a total score of 5 (Morgantown) and no school had a total score of 15. Total scores ranged from 5 to 13, with a mean of 9.8 and a mode of 10.

For each service, statewide average scores were calculated, ranging from 1 (indicating no provision of service in high schools across the state) to 3 (indicating sufficient service provision by all high schools in the state). The most sufficiently provided Pre-ETS statewide was Counseling on Post- Secondary Opportunities (2.15), followed by Job Exploration Counseling (2.11), Work Based Learning Experiences (2.04), Workplace Readiness Training (1.88) and Instruction in Self-Advocacy (1.66). Across all five Pre-ETS categories, the statewide average score was 1.97.

Across all five required Pre-ETS activities statewide, a rating of 1 was scored for a total of 106 responses (Job Exploration Counseling – 16; Work Based Learning Experiences – 10; Counseling on Postsecondary Opportunities – 19; Workplace Readiness Training – 20; and Instruction in Self Advocacy – 41), a rating of 2 was scored for a total of 356 responses (Job Exploration Counseling – 66; Work Based Learning Experiences – 86; Counseling on Postsecondary Opportunities – 56; Workplace Readiness Training – 83; and Instruction in Self Advocacy – 65), and a rating of 3 was scored for a total of 88 responses (Job Exploration Counseling – 28; Work Based Learning Experiences – 14; Counseling on Postsecondary Opportunities – 35; Workplace Readiness Training – 7; and Instruction in Self Advocacy – 4).

The results of the survey indicate that most high schools in West Virginia are providing some level of required Pre-ETS activity. However, there are locations within the state in which Pre-ETS are not provided or are provided minimally by the school. To ensure that Pre-ETS are available to students with disabilities in high schools statewide, as well as eliminate duplication of services, DRS will prioritize and emphasize Pre-ETS provision in categories and high schools which were rated as 1, with secondary priority to those high schools and Pre-ETS categories which were rated as 2. Additionally, DRS will continue to explore and expand options for Pre-ETS provision and best practices statewide.

K. ANNUAL ESTIMATES

Describe:

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

The West Virginia Division of Rehabilitation Services (DRS) calculated its estimate of individuals with disabilities who are eligible for services under this State Plan by applying the state incidence of disability rate for individuals ages 18–64 (17.4%) to the state general population

figure for individuals who are ages 18–64 (1,118,913). Both statistics are from the U.S. Census Bureau’s 2012–2016 American Community Survey five-year estimates.

Based on an estimate from the American Community Survey (as of January 2018), there are 194,175 people with a disability in West Virginia between ages 18–64. If DRS authorizes a Fiscal Year (FY) 2019 average of \$1,585 of services per consumer in a fiscal year, then over \$307 million would be needed to purchase vocational rehabilitation (VR) services for these potentially eligible individuals to move them toward competitive employment outcomes.

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

A. THE VR PROGRAM;

In FY 2021, the Division expects to serve 4,816 consumers with disabilities (excluding potentially eligible students with disabilities), obligating \$9.1 million of Title I funds for purchasing services for consumers. This estimate is based on historical data and current trends in caseload levels, Order of Selection, the current and projected impact of COVID-19, and the availability of fiscal and personnel resources. While the agency has experienced a decrease in its number of consumers in recent years, the trend is expected to reverse, and the agency anticipates that the number of individuals in the VR system will increase in future years. The COVID-19 pandemic is having a negative impact on VR service delivery by creating barriers that reduce VR counselors’ ability to provide and the consumers’ ability to immediately receive face to face services. The COVID-19 pandemic also presents a challenge for potential VR consumers to obtain information about DRS services, especially for students with disabilities who may also find web-based, virtual learning, and information gathering a more challenging experience. These students with disabilities may be in need of additional support from schools and DRS.

As the agency continues to implement the Workforce Innovation and Opportunity Act, there will continue to be dynamic forces and multiple factors that contribute to the estimated number of consumers served by the agency. One factor is the agency continuing to experience a high level of turnover among its vocational rehabilitation counselors. This contributes to lower service levels due to the learning curve for new counselors. Another contributing factor to the estimates is the provision of pre-employment transition services. The agency has shifted fiscal and human resources to better serve students with disabilities.

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

In FY 2021, the Division expects to serve 142 consumers with most significant disabilities (i.e., OS category 1) in supported employment, using Title VI-B (for youth and adults with most significant disabilities) funds and Title I funds, as needed. This estimate is based on historical data and current trends in caseload levels, Order of Selection, the current and projected impact of COVID-19 (e.g., face to face service provision and job coaching opportunities), and the availability of fiscal and personnel resources. Additionally, DRS is working with the West Virginia Developmental Disabilities Council and the West Virginia Department of Education, Office of Special Education, to identify and serve more students with the most significant disabilities. While the agency has experienced a decrease in its number of consumers in recent years, the trend is expected to reverse, and the agency anticipates that the number of individuals in the VR system will increase in future years.

DRS plans to continue using three prevalent models of supported employment services: individual placement, mobile work crews, and enclaves. Additionally, DRS will encourage and support development of affirmative industries that integrate workers with disabilities and workers without disabilities throughout the community rehabilitation program (CRP)

network. DRS considers each placement on an individualized, case-by-case basis to ensure the placement setting meets the definition of an integrated employment setting. For consumers with the most significant disabilities in supported employment, DRS strives for each consumer to achieve a competitive, integrated employment outcome.

DRS policies defining competitive employment settings promote linking CRPs with federal and state work contracts that may exist within the community. Such links expand job opportunities for individuals receiving SE, particularly those who reside in rural locations. This approach also directs Title VI-B and Title I funds into placement-related services and activities.

As of December 2019, DRS has acknowledged vendor agreements with 72 CRPs with 80 service locations to provide services to DRS consumers, including individuals with the most significant disabilities in supported employment. In FY 2019, DRS authorized \$160,311.95 in SE services for 73 adults with disabilities and \$168,773.56 in SE services for 56 youth with disabilities.

As the agency continues to implement the Workforce Innovation and Opportunity Act, there will continue to be dynamic forces and multiple factors that contribute to the estimated number of consumers served by the agency. One factor is the agency continuing to experience a high level of turnover among its vocational rehabilitation counselors. This contributes to lower service levels due to the learning curve for new counselors. Another contributing factor to the estimates is the provision of pre-employment transition services. The agency has shifted fiscal and human resources to better serve students with disabilities.

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

In Fiscal Year 2021, it is estimated that:

- 2,414 individuals will be served in OS Category 1, using an estimated \$4,103,800 of Title I funds (average of \$1,700 per year). Additionally, out of the 2,414 individuals served in OS Category 1, DRS will serve 142 youth and adults with the most significant disabilities in supported employment utilizing \$300,000 in Title VI-B funds, as appropriate.
- 1,667 individuals will be served in OS Category 2, using an estimated \$2,833,900 of Title I funds (average of \$1,700 per year).
- 735 individuals will be served in OS Category 3, using an estimated \$2,205,000 of Title I funds (average of \$3,000 per year).

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

All OS Categories will be open during Federal Fiscal Year 2021, as long as sufficient fiscal and personnel resources remain available to provide VR services to all eligible applicants

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.

In Fiscal Year 2021, it is estimated that:

- 2,414 individuals will be served in OS Category 1, using an estimated \$4,103,800 of Title I funds (average of \$1,700 per year). Additionally, out of the 2,414 individuals served in OS Category 1, DRS will serve 142 youth and adults with the most significant disabilities in supported employment utilizing \$300,000 in Title VI-B funds, as appropriate.

- 1,667 individuals will be served in OS Category 2, using an estimated \$2,833,900 of Title I funds (average of \$1,700 per year).
- 735 individuals will be served in OS Category 3, using an estimated \$2,205,000 of Title I funds (average of \$3,000 per year).

L. STATE GOALS AND PRIORITIES

The designated State unit must:

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 West Virginia Division of Rehabilitation Services (DRS) employs many goals to meet the needs of individuals with disabilities, particularly those individuals with the most significant disabilities. Furthermore, DRS recognizes those services essential to needs identified in the comprehensive assessment, evaluation of the Designated State Unit's performance on the Workforce Innovation and Opportunity Act (WIOA) common performance measures to ensure quality services for individuals with significant disabilities, and services vital to the operation and effectiveness of the vocational rehabilitation (VR) program in West Virginia.

For the development of agency goals and priorities, DRS followed WIOA guidance in the development of the Unified State Plan. DRS worked closely with the WIOA core partners including WorkForce WV and West Virginia Adult Education. The DRS goals and priorities were developed to support the overall state goals and priorities in achieving a well-integrated workforce development system that provided customer-focused services to job seekers in West Virginia.

The West Virginia State Rehabilitation Council (SRC) maintained involvement throughout the development and assessment of agency goals and priorities in a variety of ways and provided DRS with valued input and recommendations. DRS executive managers, representatives of SRC, the West Virginia Statewide Independent Living Council (SILC), and the Client Assistance Program (CAP) were invited to discuss DRS goals and priorities for carrying out the VR and supported employment programs. The Executive Directors of the SRC and SILC attend monthly DRS Executive Management Group (EMG) meetings to discuss various ongoing issues affecting the agency and are privy to the current goals, objectives, and strategies pertaining to specific agency issues. Additional involvement occurs through DRS staff members attending SRC and SILC meetings to share information regarding agency performance, needs assessment, and State Plan activities. The SRC was afforded electronic access to the Program Year (PY) 2020 State Plan for review. Additionally, the SRC formed a subcommittee on needs assessment and the State Plan. The SRC members discuss DRS activities at regularly scheduled meetings and provide input to DRS.

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS

The workforce development system (WDS) of West Virginia believes that all of its successful activities positively contribute to the ongoing mission of increasing the labor force participation rate. To maximize its ability to achieve this mission, the WDS has identified the following goals for Program Years 2020-2023:

Goal 1: Maximize Efficiency of the WDS

For WIOA to continue to be successful the workforce development system must be seamless, comprehensive, and accessible. Partners in the workforce development system will work together in order to maximize benefits to our customers and improve West Virginia's labor force participation rate.

Goal 2: Strengthen Relationships with Employers

Collaborate with employers utilizing a variety of methods to develop solutions to their workforce needs.

Goal 3: Overcome Employment Barriers of Individuals

Identify employment barriers of individuals and develop solutions. The removal of barriers is a key component to improving West Virginia's labor force participation rate.

Goal 4: Promote Career Pathways

Emphasize career pathways to assist individuals entering and moving within the labor force and to educate employers on the advantages of career pathways.

Goal 5: Identify and Maximize Postsecondary and Employment Opportunities for Youth

Identify employment challenges faced by youth and provide access to postsecondary training/education and employment opportunities to improve West Virginia's labor force participation rate.

Goal 6: Align West Virginia's Labor Force Participation Rate with the National Labor Force Participation Rate

West Virginia has the lowest Labor Force Participation Rate in the United States. Increasing labor force participation rates and reducing unemployment rate disparities for people with disabilities, both younger and older workers, and people with lower educational attainment would lead to measurable increases in the size of the state's available labor force. Helping minorities and other groups with barriers to employment is critical to ensuring that West Virginia's employers are able to find workers and our economy is able to expand.

DRS is fully committed to coordinate its activities and services with core and community partners to ensure successful completion of the aforementioned goals. The following goals highlight specific focus areas for DRS that will also contribute to the overall goals of the West Virginia WDS:

DRS Goal 1 – Provide integrated vocational rehabilitation services to West Virginians with disabilities to promote attainment of a high school education or greater, in order to increase their ability to move through meaningful career pathways. Compared to the national average of 30.9%, West Virginia has a much lower percentage of individuals 25 years and older having attained a bachelor's degree (19.9%; from <https://www.census.gov/quickfacts/fact/table/WV,US/PST045218>). For individuals with disabilities, the percentage is much lower, at 5.8% (from the Annual Disability Statistics Compendium: 2018). While a majority (75.6%) of West Virginians with disabilities age 25 or over have a high school education or higher, nearly a fourth (24.4%) of this population does not, compared to only 8.6% of the State's population of 25 or older without a disability (Annual Disability Statistics Compendium: 2018). Close relationships with the West Virginia Adult Education Program (Adult Ed) and the West Virginia Higher Education Policy Commission, as well as State and Local Education Agencies, will help to close this education gap.

DRS Goal 2 – Provide Pre-Employment Transition Services (Pre-ETS) to students with disabilities. Pursuant to requirements of WIOA and findings from the 2018 CSNA, DRS will, in cooperation with State and Local Education Agencies, provide Pre-ETS to students with disabilities, focusing on students 21 years or younger while still in high school. The provision of Pre-ETS offers students with disabilities information about careers, career opportunities, education and training programs, and self-advocacy. This information and work-based experiences can lead to more well-informed career decision making and can empower students with disabilities to become more educated and skilled, moving toward a career that meets their needs.

DRS Goal 3 – Provide integrated vocational rehabilitation services to West Virginians with disabilities, committing to the use of the Employment First framework, to enable them to obtain competitive, integrated employment, especially in occupations and careers within emerging industries statewide. From a Bureau of Labor Statistics' October 2019 report, West Virginia had the lowest workforce participation rate (all individuals, with and without disabilities) among all the states and the District of Columbia, with 55.3% compared to the national average of 63.3%. Individuals with barriers to employment, including those with disabilities, have lower employment/workforce participation rates. Labor force participation among persons with disabilities in West Virginia has been steadily declining in recent years. Since 2010, labor force participation among these individuals is estimated to have fallen from 31.7% (63,609) to 26.1% (49,199) in 2018. As of 2018, labor force participation for persons with disabilities in West Virginia was almost 11 percentage points below the national rate of 37.0%. West Virginia has a high poverty rate, with 17.8% of residents below the poverty level compared to 11.8% nationally (<https://www.census.gov/quickfacts/fact/table/US/IPE120218>). The poverty rate is especially high for individuals with disabilities, with estimates that 34.5% of West Virginians with disabilities above the age of 18 (64,907 of 187,988) were living in poverty in 2017, the highest rate in the nation, excluding Puerto Rico. Even among those employed, there are still significant numbers of West Virginians who earn below the poverty line.

Workforce West Virginia expects the largest numeric change in employment growth (from 2016 to 2026) to occur in the industries of Health Care and Social Assistance (+19,026; 14.94%), Ambulatory Health Care Services (+9,675; 23.90%), Educational Services (+4,498; 7.52%), Government (+3,996; 5.40%), Construction (+3,701; 12.36%), and Social Assistance (+3,507; 19.67%).

Findings from the 2018 Comprehensive Statewide Needs Assessment (CSNA) indicated the need to improve VR services in specific ways to warrant the creation of two additional DRS goals.

DRS Goal 4 – Improve access and availability of transportation options for DRS consumers who need transportation assistance to achieve or maintain competitive, integrated employment. FY 2018 CSNA findings from field staff surveys indicate a need for continued efforts to increase the availability of transportation throughout the state. Based on responses by stakeholders across the state, including observations and recommendations by the West Virginia State Rehabilitation Council, transportation continues to be an issue and a perceived barrier to employment/training. DRS continues to focus on individualized transportation solutions (ITS) to help alleviate the transportation gap while taking into account the wide array of circumstances that West Virginians with disabilities experience. DRS counselors also encourage consumers' family members to assist with reimbursable transportation. DRS will continue to make sure that consumers are aware of these options and continue to identify targeted solutions to the varied transportation issues for West Virginians with disabilities, focusing specifically on ITS.

DRS Goal 5 – Continue to build collaborative relationships with community providers [including community rehabilitation programs (CRPs), Independent Living, and other community providers] to enhance the availability of services to DRS consumers. VR consumers require specialized services provided by CRPs statewide to achieve an integrated, competitive employment outcome. Responses from the CSNA indicate there still is a need for DRS to continue to improve collaborative relationships with all community providers. Findings from the CSNA point to a need to focus efforts on specific geographic areas within the state where miscommunication between community providers and DRS counselors continues.

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;

For the development of agency goals and priorities, DRS followed WIOA guidance in the development of the Unified State Plan. DRS worked closely with the WIOA core partners including WorkForce West Virginia and West Virginia Adult Education. The DRS goals and priorities were developed to support the overall state goals and priorities in achieving a well-integrated workforce development system that provided customer-focused services to job seekers in West Virginia.

The West Virginia SRC maintained involvement throughout the development and assessment of agency goals and priorities in a variety of ways and provided DRS with valued input and recommendations. DRS executive managers, representatives of SRC, the West Virginia SILC, and the CAP were invited to discuss DRS goals and priorities for carrying out the VR and supported employment programs. The Executive Directors of the SRC and SILC attend monthly DRS EMG meetings to discuss various ongoing issues affecting the agency and are privy to the current goals, objectives, and strategies pertaining to specific agency issues. Additional involvement occurs through DRS staff members attending SRC and SILC meetings to share information regarding agency performance, needs assessment, and State Plan activities. The SRC was afforded electronic access to the PY 2020 State Plan for review. Additionally, the SRC formed a subcommittee on needs assessment and the State Plan. The SRC members discuss DRS activities at regularly scheduled meetings and provide input to DRS.

Findings from the 2018 CSNA indicated the need to improve VR services in specific ways to warrant the creation of two additional DRS goals.

DRS Goal 4 – Improve access and availability of transportation options for DRS consumers who need transportation assistance to achieve or maintain competitive, integrated employment. FY 2018 CSNA findings from field staff surveys indicate a need for continued efforts to increase the availability of transportation throughout the state. Based on responses by stakeholders across the state, including observations and recommendations by the WV State Rehabilitation Council, transportation continues to be an issue and a perceived barrier to employment/training. DRS continues to focus on ITS to help alleviate the transportation gap while taking into account the wide array of circumstances that West Virginians with disabilities experience. DRS counselors also encourage consumers' family members to assist with reimbursable transportation. DRS will continue to make sure that consumers are aware of these options and continue to identify targeted solutions to the varied transportation issues for West Virginians with disabilities, focusing specifically on ITS.

DRS Goal 5 – Continue to build collaborative relationships with community providers (including CRPs, Independent Living, and other community providers) to enhance the availability of services to DRS consumers. VR consumers require specialized services provided by CRPs statewide to achieve an integrated, competitive employment outcome. Responses from the CSNA indicate there still is a need for DRS to continue to improve collaborative relationships with all community providers. Findings from the CSNA point to a need to focus efforts on specific geographic areas within the state where miscommunication between community providers and DRS counselors continues.

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

DRS acknowledges the legal requirement to report on the performance accountability indicators under Section 116 of WIOA. However, data collection on the performance accountability indicators is only beginning, making a full report of DRS performance impossible at this time. As DRS moves forward in its task to place individuals with disabilities into competitive, integrated employment in PY 2020, it will continue to collect and monitor participant data in order to generate reports on:

- The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program;
- The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program;
- The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program;
- The percentage of program participants who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent, during participation in or within 1 year after exit from the program;
- The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains toward such a credential or employment; and
- The indicators of effectiveness in serving employers.

For PY 2018, DRS achieved the following performance on the performance accountability indicators under section 116 of WIOA:

- The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program – 61.8%
- The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program – \$4,595.70
- The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains toward such a credential or employment – 56.8%

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.

For the development of agency goals and priorities, DRS followed WIOA guidance in the development of the Unified State Plan. DRS worked closely with the WIOA core partners including WorkForce West Virginia and the West Virginia Adult Education. The DRS goals and priorities were developed to support the overall state goals and priorities in achieving a well-integrated workforce development system that provided customer-focused services to job seekers in West Virginia.

The West Virginia SRC maintained involvement throughout the development and assessment of agency goals and priorities in a variety of ways and provided DRS with valued input and recommendations. DRS executive managers, representatives of SRC, the West Virginia SILC, and the CAP were invited to discuss DRS goals and priorities for carrying out the VR and supported employment programs. The Executive Directors of the SRC and SILC attend monthly DRS EMG meetings to discuss various ongoing issues affecting the agency and are privy to the current goals, objectives, and strategies pertaining to specific agency issues. Additional involvement occurs through DRS staff members attending SRC and SILC meetings to share information regarding agency performance, needs assessment, and State Plan activities. The SRC was afforded electronic access to the PY 2020 State Plan for review. Additionally, the SRC formed a subcommittee on needs assessment and the State Plan. The SRC members discuss DRS activities at regularly scheduled meetings and provide input to DRS.

M. ORDER OF SELECTION

Describe:

1. WHETHER THE DESIGNATED STATE UNIT WILL IMPLEMENT AN ORDER OF SELECTION. IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES

The Division's Director will determine whether resources will be available to provide vocational rehabilitation services to all eligible individuals throughout the program year. If not, consistent with state and federal laws and regulations, the Director will establish restrictions regarding priority categories for selecting the order in which otherwise eligible individuals may be served. Only the Director may establish an order of selection.

The West Virginia Division of Rehabilitation Services (DRS) will be operating under an order of selection (OS) with all OS categories open, as long as sufficient fiscal and personnel resources remain available to provide services to all eligible consumers.

Description of Priority categories Priority Categories

Following are the order of selection categories currently applicable to the Division's vocational rehabilitation program:

Category 1: Eligible applicants with the most significant disabilities.

Category 2: Eligible applicants with significant disabilities.

Category 3: Eligible applicants with non-significant disabilities.

The Counselor will determine the significance of an individual's disability after conducting a diagnostic study that allows for assessing the permanency of the disability, the number of functional capacities limited by the disability, the number of vocational rehabilitation (VR) services needed, and the time in service required to complete those services. These criteria

are used when determining whether the individual's disability is non-significant, significant, or most significant.

Definitions

Individual with a Most Significant Disability (MSD).

An individual who:

1. Has a permanent physical or mental impairment which seriously limits three or more functional capacities (mobility, communication, self-care, self-direction, interpersonal skills, work tolerances, or work skills) in terms of an employment outcome; and
2. Will require multiple vocational rehabilitation services over an extended period of time.

Alternatively, any individual who will be receiving services under an individualized supported employment plan for employment will be determined to be MSD.

Individual with Significant Disability (SD).

An individual who:

1. Has a permanent physical or mental impairment which seriously limits one or more functional capacities (mobility, communication, self-care, self-direction, interpersonal skills, work tolerances, or work skills) in terms of an employment outcome; and
2. Will require multiple vocational rehabilitation services over an extended period of time.

Individual with Non-Significant Disability.

An individual with a non-significant disability is an individual who:

1. Has a permanent disability that results in a substantial impediment to employment; and
2. Will not require multiple vocational rehabilitation services over an extended period of time.

Time in Service

For the purpose of determining significance of disability, "time in service" is considered to begin upon implementation of the Individualized Plan for Employment and end upon entering Status 22 (in employment).

Automatic Classification as an Individual with Significant Disability

An individual who is a Social Security Disability Insurance (SSDI) beneficiary or Supplemental Security Income (SSI) recipient will be coded automatically as SD. However, if the individual meets MSD criteria, that designation will apply.

Recertification

An individual may be recertified from SD to MSD if all MSD criteria are met. In such instances, the Counselor will note appropriate circumstances in the Action Statement/Details section of the consumer's case record.

DRS Responsibilities when Implementing an Order of Selection

An OS has no impact on the DRS obligation for case finding and referrals. DRS has a continuing responsibility to make the public and referral sources aware of the services it has to offer

individuals with disabilities, especially those with the most significant disabilities. Furthermore, DRS shall ensure its funding arrangements for providing services, including third party arrangements and establishment projects, are consistent with the OS. Any funding arrangements that are inconsistent with the OS will be renegotiated.

Priority of categories to receive VR services under the order OS Administration Process

All OS Categories will be open during Federal Fiscal Year 2021, as long as sufficient fiscal and personnel resources remain available to provide VR services to all eligible applicants with most significant, significant, and non-significant disabilities.

Services necessary for determination of eligibility and assessment of rehabilitation needs are provided to all DRS applicants. Any individual notified by the Counselor of classification as a member of an open priority category shall continue to receive services should that category later be closed.

Plan for Implementing the Order of Selection

All OS Categories will be open during Federal Fiscal Year 2021, as long as sufficient fiscal and personnel resources remain available to provide VR services to all eligible applicants with most significant, significant, and non-significant disabilities.

DRS will strictly adhere to federal regulations in administering its OS. DRS will continue to: (1) implement the order on a statewide basis; (2) notify all eligible persons of their assignment to a particular priority category and their right to appeal this assignment; (3) assure continuity of services to all persons who were receiving services under an Individualized Plan for Employment (IPE) prior to the effective date of the closure order; and (4) assure that funding arrangements are consistent with the OS [34 CFR 361.36(e)].

When the order of selection is implemented, DRS will continue to ensure that an eligible individual who is not assigned to an open OS category has access to services provided under the information and referral system [Section 101(a)(5)(D) of the Act]. Information and referral services include: (1) providing VR information and guidance to assist the individual to achieve employment and (2) appropriately referring the individual to other federal and state programs, including other statewide workforce development programs, that are best suited to meet the individual's specific employment needs [Section 101(a)(20)(A) of the Act].

When making a referral, DRS will provide the individual with:

- a notice of the referral;
- information about a specific point of contact within the program to which the individual is being referred; and
- information and advice about the most suitable service for assisting the individual to prepare for, secure, retain, or regain employment [Section 101(a)(20)(B)(ii) of the Act and 34 CFR 361.37(b)(2)].

DRS will continue to maintain the individual's service record to include documentation on the nature and scope of the information and referral services it provides to the individual and documentation on the referral itself [34 CFR 361.47(a)(13)].

DRS will open and close priority categories as needed, so long as the order of the categories is maintained and continuity of services to all individuals selected for services is assured.

DRS will use the individual's date of application to rank individuals within a priority category. This equitable and reasonable factor provides a method of selecting individuals from a waiting list when DRS has enough resources to serve some, but not all, individuals in that OS priority category.

B. THE JUSTIFICATION FOR THE ORDER

All OS Categories will be open during Federal Fiscal Year 2021, as long as sufficient fiscal and personnel resources remain available to provide VR services to all eligible applicants with most significant, significant, and non-significant disabilities. However, while DRS currently has the capacity to serve all eligible individuals with disabilities who apply for services, DRS will continue to implement an OS due to an expected influx of applicants and potentially eligible students with disabilities after the COVID-19 pandemic has subsided. This potential inundation of applicants and students may overwhelm the agency's human resource capacity to serve all eligible individuals who apply for services. At that time, it would necessitate the need to close one or more OS Categories to ensure priority of services to individuals with the most significant disabilities. DRS will continue to monitor caseload size, vacancies, and other related measures to ensure proactive measures are taken, if needed.

In recent years, DRS has experienced difficulties in hiring new vocational rehabilitation counselors in specific geographical areas, as well as barriers resulting from the State's hiring policies and procedures (e.g., non-competitive salary, processing times, etc.). DRS often has competition from bordering states, county school boards, and private employers that offer higher salaries to potential DRS employees. In the meantime, the agency continues to seek additional vocational rehabilitation counselors and works with the state hiring agency to increase the number of applicants to DRS job postings.

C. THE SERVICE AND OUTCOME GOALS

In FY 2021, the agency plans to serve 4,816 individuals with an expected outcome goal of 1,119 rehabilitants within a service time frame of 12 and 28 months and at a cost of \$9.1 million for all priority categories.

D. TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER; AND

In FY 2021, it is projected that:

- 2,414 individuals in OS Category 1 will be served. Approximately 434 individuals in this OS Category will exit with employment after receiving services. Approximately 651 individuals in this OS Category will exit without employment after receiving services. The time within which the goal of employment is to be achieved for individuals in this OS Category is estimated to be 28 months. The cost of services for all individuals in this OS Category is estimated to be \$4,103,800 during FY 2021.

- 1,667 individuals in OS Category 2 will be served. Approximately 480 individuals in this OS Category will exit with employment after receiving services. Approximately 384 individuals in this OS Category will exit without employment after receiving services. The time within which the goal of employment is to be achieved for individuals in this OS Category is estimated to be 26 months. The cost of services for all individuals in this OS Category is estimated to be \$2,833,900 during FY 2021.

- 735 individuals in OS Category 3 will be served. Approximately 205 individuals in this OS Category will exit with employment after receiving services. Approximately 105 individuals in this OS Category will exit without employment after receiving services. The time within which the goal of employment is to be achieved for individuals in this OS Category is estimated to be 14 months. The cost of services for all individuals in this OS Category is estimated to be \$2,205,000 during FY 2021.

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES

All OS Categories will be open during Federal Fiscal Year 2021, as long as sufficient fiscal and personnel resources remain available to provide VR services to all eligible applicants with most significant, significant, and non-significant disabilities.

DRS' Client Services Manual clearly outlines OS Categories to ensure priority services for persons with MSD throughout the state. Priority is given to individuals with the most significant disabilities (OS 1), then to individuals with significant disabilities (OS 2), then to individuals with non-significant disabilities (OS 3). Furthermore, DRS has budgeted sufficient resources to serve all consumers with disabilities in all open OS Categories with priority given to persons with MSD. DRS utilizes data and caseload management reports to monitor and ensure services to OS Category 1, persons with MSD, are maintained through the FY.

DRS will open or close OS Categories as needed; these actions will be included in an amendment to the State Plan. DRS will assess the agency's fiscal and personnel resources and ability to maintain continuous VR services prior to opening or closing each OS Category. DRS will ensure that individuals with MSD are being served, with no individuals with MSD on the waitlist prior to opening the next OS Category.

When a closed category is reopened for services, individuals in that category will be notified in writing by DRS that they can now receive services. DRS will ensure all individuals selected for services will continue to receive those services without interruption.

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

DRS has not elected to serve eligible individuals regardless of any established order of selection, who require specific services or equipment to maintain employment.

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

The methodology of the West Virginia Division of Rehabilitation Services (DRS) for distribution of Title VI-B funds is based exclusively on a fee-for-service authorization process with approved vendors of supported employment (SE) services. DRS uses no Title VI-B funds for administrative costs. Utilizing the DRS fee schedule for SE services, rehabilitation counselors utilize Title VI-B and Title I funds to provide needed SE services for eligible individuals with the most significant disabilities.

DRS established a statewide fee-for-service funding approach for job development services for SE-eligible individuals. This structure provides vendors an effective and efficient way of meeting the costs of this critical element of the job placement process. The process provides

reimbursement for employment outcomes and brings increased energy and vendor resources to support job development activities.

In Program Year 2019, DRS authorized the full \$300,000.00 of its Title VI–B funds to serve individuals with the most significant disabilities in its SE program through community rehabilitation program (CRP) services. When Title VI–B funds (\$300,000 total per year with \$150,000 available only for youth with disabilities) are exhausted, DRS defrays supported employment program service costs with Title I funds for individuals who require the services or who qualify and have not yet been served under the supported employment program. In Program Year 2018, DRS authorized \$173,749 in SE services for 74 adults with disabilities and \$174,258 in SE services for 58 youth with disabilities.

DRS plans to continue using three prevalent models of supported employment services: individual placement, mobile work crews, and enclaves. Additionally, DRS will encourage and support development of affirmative industries that integrate workers with disabilities and workers without disabilities throughout the CRP network. DRS considers each placement on an individualized, case-by-case basis to ensure the placement setting meets the definition of an integrated employment setting. For consumers with the most significant disabilities in supported employment, DRS strives for each consumer to achieve a competitive, integrated employment outcome.

DRS policies defining competitive employment settings promote linking CRPs with federal and state work contracts that may exist within the community. Such links expand job opportunities for individuals receiving SE, particularly those who reside in rural locations. This approach also directs Title VI–B and Title I funds into placement-related services and activities.

As appropriate, DRS will use the State funds allocated (\$78,000) for ESES to expand employment opportunities for youth with the most significant disabilities (MSD). DRS will continue to educate the legislature regarding ESES for youth with MSD to ensure continued funding for ESES.

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

DRS continues to strongly promote and support training and support services for youth with disabilities, especially those with the most significant disabilities. DRS uses its fiscal and case management systems to continuously monitor resources (especially reserved funds to be used with youth with the most significant disabilities) being used for Extended Supported Employment Services (e.g., job coaching for supported employment).

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.

Through a combined effort with other disability organizations, \$78,000 was appropriated by the West Virginia Legislature for supported employment follow-along services (extended supported employment services; ESES). DRS serves as the fiscal agent for these funds. DRS has created program guidelines governing the use of state-appropriated funds for extended services under the supported employment program created by state statute in 1993. The sole use of the state funds attached to this program is to provide extended services for individuals not eligible from any other funding source. All providers of supported employment services may access these funds for individuals who are eligible under the guidelines. During Program Year 2018, DRS

sponsored 41 individuals in the extended supported employment program so they could maintain and retain their jobs within the community. This figure represents the cooperative efforts of 10 CRPs.

As appropriate, DRS will use the State funds allocated (\$78,000) for ESES to expand employment opportunities for youth with the most significant disabilities (MSD). DRS will continue to educate the legislature regarding ESES for youth with MSD to ensure continued funding for ESES.

O. STATE'S STRATEGIES

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES

West Virginia Division of Rehabilitation Services (DRS) Goal 1 – Provide integrated vocational rehabilitation (VR) services to West Virginians with disabilities to promote attainment of a high school education or greater, in order to increase their ability to move through meaningful career pathways.

DRS will continue to monitor the educational achievement of all of its consumers, especially those in the transition youth (TY) population. Youth have become a primary focus in vocational rehabilitation and DRS will work closely and diligently with State and Local Education Agencies to ensure that its TY population receives the services that it needs, including pre-employment transition services (Pre-ETS) for students with disabilities. Each high school in WV has a DRS counselor assigned to it to guarantee the service provision of students with disabilities. A greater emphasis is now being placed for counselors to do outreach with these students and their parents/guardians during their freshman and sophomore years (rather than their junior year, as was formerly practiced) in order to maximize the counseling opportunities.

DRS counselors will continue to take part in the Individualized Education Program (IEP) development of students with disabilities when they are invited to do so. Counselors will also stay in contact with educators to discuss and resolve educational difficulties as they arise. DRS will also work closely with WV Adult Education, referring consumers as needed, to ensure that individuals with disabilities have an adequate opportunity to obtain a completed high school level education.

DRS Goal 2 – Provide Pre-ETS to students with disabilities.

The 2018 comprehensive statewide needs assessment (CSNA) indicated that job exploration counseling was the most frequently reported pre-employment transition service need. In accordance with this, and per the requirements of the Workforce Innovation and Opportunity Act (WIOA), DRS counselors in high schools will provide Pre-ETS to students with disabilities, especially job exploration counseling, in order to give students with disabilities and their parents/guardians a better understanding of labor market conditions, current and emerging career opportunities, and the necessary education and training requirements related to those opportunities.

DRS will continue to work closely with the West Virginia Office of Special Education to ensure that special education teachers, parents, and students with disabilities are aware of the availability of Pre-ETS. This work will continue through joint-training conferences with special education staff from across the state. Additional, intensive training on the Pathways to the Future Pre-ETS website will also continue to be provided to special education teachers in upcoming years. As part of its outreach campaign, DRS will continue to place large banners in high schools and distribute Pre-ETS materials to students with disabilities across the state. Additional outreach using large posters will target eighth grade, career and technical education, and postsecondary students at locations across the state.

In addition to ongoing program activities, DRS will continue to sponsor the Career Exploration Opportunity (CEO) Summits, four-day summer workshops for students with disabilities statewide. The CEO Summits will be held in multiple locations across the state to ensure statewide coverage. DRS will utilize the assistance of Community Rehabilitation Programs (CRPs) to conduct the Summit activities. Class size for each of the Summits will be approximately 20 students. Students will earn a stipend for the time that they attend. DRS will also request WorkForce West Virginia and West Virginia Adult Education to participate in the Summits to provide additional information to the students.

Topics to be covered:

- Career planning
- Career preparation
- SSI/SSDI Information
- Understanding the importance of necessary personal documents (e.g., social security card, driver's license, birth certificate, pay stubs).
- Communication
- Conflict Management
- Employer Expectations
- Attendance and Punctuality
- Timeliness of task completion
- Be able to work without supervision
- Positive work ethic
- Manage multiple tasks
- High-growth Jobs
- Personal Brand
- Job Hunting Tools – resumes, cover letters, interviews, and digital profiles

DRS Goal 3 – Provide integrated vocational rehabilitation services to West Virginians with disabilities, committing to the use of the Employment First framework, to enable them to obtain competitive employment, especially in occupations and careers within emerging industries statewide.

Collaboration with WorkForce West Virginia (WFWV)

DRS will maintain regular communication with WFWV to stay abreast of trends in employment, including changes in education and training requirements. This will be accomplished through regular meetings of the workforce development system (WDS), written communications, teleconferences, and other media, as appropriate. DRS, particularly through its employment specialists, will also stay informed of emerging careers and occupations via WFWV's Labor Market Information website. DRS employment specialists continuously collect employment information from their business contacts. This information, including job orders for open positions, is immediately input into the WFWV's online Mid Atlantic Career Consortium (MACC) system and shared within the WDS.

DRS will continue to serve on Business Service Teams (BSTs) with WFWV, Adult Education, local workforce development boards, and other related entities. Through training and standardizing informational materials, when possible, these teams provide a full range of WDS information when making visits to employers. This will allow the WDS to maximize the impact of employer visits and ensure that businesses are aware of all resources available through the WDS.

Use of DRS Employment Specialists

DRS will continue to use its employment specialists to gather information regarding employers at the local level, including information regarding job placements for individuals with disabilities and regarding current and expected employer needs.

DRS has an in-house Employer Services Section that specializes in providing employers with disability-related information, services, and pre-screened job seekers. The DRS Employer Services Section has 9 employment specialists that cover all 55 counties in West Virginia. DRS' team of employment specialists provide business owners and employers with critical business options and assistance in staffing, employee retention strategies, education on disability-related issues, job accommodations, and information about financial incentives for employers who hire individuals with disabilities.

Direct contact with employers is a key strategy to identify competitive integrated employment and career exploration opportunities for VR consumers, including students with disabilities. Employment specialists therefore contact employers directly to identify current and future job openings. To facilitate this, DRS utilizes labor market information provided by WFWV to identify the top employers in each county; contact is always made with the top ten employers in each county. When meeting with employers, employment specialists provide valuable information, including the DRS Employer Resource Guide and employment-related WFWV information. The DRS Employer Resource Guide provides the following information:

- Staffing services
- Training programs and incentives for hiring people with disabilities
- Financial incentives
- Accessibility assessments
- Accommodating employees with disabilities
- Basic disability etiquette
- Attitudinal barriers

- Americans with Disabilities Act
- Locating a DRS office
- Where to find additional resources

The Employer Services Section maintains a database of each DRS–employer interaction with VR employment specialists. The information collected includes the business name, contact person, and current job openings by occupation. If needed, a referral to the DRS Rehabilitation Technology Unit is made to address workplace accommodations. This list is distributed to field staff to potentially match a job–ready VR consumer with a current job opening. Through positive working relationships, 47 employers, including some of the largest in the state, now send job postings directly to DRS’ Employer Services Section.

The Employer Services Section also works with employers to better serve transitioning youth with disabilities, including providing career exploration opportunities for students with disabilities. In 2015, DRS debuted the Positive Outcomes within Education and Rehabilitation (POWER) program. POWER is a job shadowing program that offers transitioning students, who may be having a difficult time choosing a career path, the opportunity to experience an occupation by spending time with a professional working in the students’ vocational goal/career field of interest. The POWER program allows the student the opportunity to experience an occupation prior to committing to training. It guides the student to take a serious, realistic look at the occupation, allowing the student to make a more informed choice. As of November 2019, 85 employers have agreed to host job shadowing experiences with DRS’ POWER program.

Assistive Technology

DRS will continue to provide rehabilitation technology solutions to individuals with disabilities as needed so that those individuals can become employed or maintain employment. DRS has developed working relationships and agreements for the coordination of activities with the West Virginia Assistive Technology System (WVATS) of the West Virginia University Center for Excellence in Disabilities. The WVATS’ role is to provide access to and help with the acquisition of assistive technology (AT) devices and services for individuals with disabilities. WVATS also provides device demonstrations, device loans, training, AT information, and technical assistance.

DRS has a rehabilitation technology unit which provides AT consultations and solutions to eligible VR consumers with AT needs statewide. With the coordination of services between DRS and WVATS, assurances are made that needed AT solutions can be provided to individuals with disabilities.

DRS Goal 4 – Improve access and availability of transportation options for DRS consumers who need transportation assistance to achieve or maintain competitive, integrated employment.

Transportation is an ongoing issue for West Virginians with disabilities, due to the rural nature of the state. A large proportion of the State’s inhabitants live far away from jobs, agency offices, and other resources. DRS continues its commitment to reduce transportation barriers for consumers with disabilities and focuses on individual transportation solutions (ITS) to satisfy immediate transportation needs. To help reduce these barriers, DRS counselors will encourage planning for transportation needs early in the development of a consumer’s rehabilitation program. At application, counselors will identify transportation issues and focus on finding solutions to include in the consumer’s Individualized Plan for Employment (IPE). This will ensure that the ability of consumers to reach their vocational goal is not impeded by preventable transportation barriers. Transportation issues also will be addressed by the standard instrument

prescribed for routine use by supervisors and quality assurance staff in case reviews. Beyond ITS, DRS will continue to assign responsibility to a staff member in each branch office to maintain a list and working knowledge of local transportation options and will continue to participate in local and state initiatives to coordinate and expand transportation resources.

DRS Goal 5 – Continue to build collaborative relationships with community providers (including CRPs, Independent Living, and other community providers) to enhance the availability of services to DRS consumers. A large amount of the success that DRS has in its mission to enable and empower individuals with disabilities to work and to live independently hinges on its relationships with CRPs. In general, DRS has good working relationships with the various CRPs throughout the State. However, CSNA results suggest that improvements can be made, particularly in specific geographic areas. To facilitate this improvement, DRS has established a number of strategies to put into action:

- Continue to educate field staff, especially the new counselors, about CRPs and their services. Use of the new ‘CRP Locator’ tool (a web-based, user-friendly vendor guide) and counselor CRP site visits will increase awareness of available service options, which will help to maintain collaborative relationships with CRPs and enhance the availability of services to DRS consumers.
- Continue to maintain regular communications between DRS and community providers in each district and at the state level. Each DRS district will continue to host joint meetings with DRS district and branch office staff and CRPs in those districts to provide opportunities for CRP representatives and DRS personnel to discuss local service needs of DRS consumers. Subsequent to each meeting, the local DRS office will be required to send a brief report to the CRP Program Manager. This process will allow all parties involved in the expansion of community-based services to be kept informed of progress and issues. The Division will continue to examine the information and recommendations collected from various meetings between CRP and DRS staff members.

Progress on communication will continue to be made as the Division acquires more understanding of the issues and barriers facing the CRP and DRS staff members in their service provision to persons with significant disabilities in West Virginia. Ongoing communication activities with CRPs also will include:

- An email listserve with all current vendors that will be updated periodically and utilized to send out training opportunities, policy changes, and general updates when needed.
- DRS counselors in each district will continue to be assigned as liaisons to each CRP and will continue to be required to complete a monthly update regarding the CRP. They will collect this information by visits and/or phone calls. Having CRP liaisons that regularly discuss service-related issues specific to the local service area(s) will aid in maintaining collaborative working relationships and enhancing the availability of services to consumers.
- Two rehabilitation specialists covering all districts in the state will provide technical assistance to CRPs and DRS staff. They will make site visits to CRP and DRS district and branch offices. During these visits, they will provide technical assistance and schedule training and other meetings that need to occur. They will serve as a communication link when issues arise and make themselves available to attend the communication meetings and transition team meetings.
- Conduct site visits to ensure that community providers continue to meet DRS standards and requirements.

- Increase the service provision of acknowledged vendors and work with community providers to expand their service areas to enhance the availability of community services within needed areas.
- Continue to conduct Transition Team meetings at the district level with DRS, the West Virginia Department of Education, and CRP staff members. The meetings will be held to promote interagency collaboration by allowing staff from each agency/CRP to become familiar with the different eligibility requirements and service definitions across agencies.
- Continue to conduct cross training and face-to-face meetings with community partners at the local level.
- Continue to assign liaison responsibilities to staff members and provide them guidance about the purpose of DRS participation in community events.
- Monitor the DRS counselors/supervisors/managers' perception of the quality of CRP services through a survey instrument.
- Monitor and assess the impact of the Quality Assurance unit on the counselor's case management practices by using data generated from the quality assurance specialists' review of cases.

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

DRS will continue to provide rehabilitation technology solutions to individuals with disabilities as needed so that those individuals can become employed or maintain employment. DRS has developed working relationships and agreements for the coordination of activities with the WVATS of the West Virginia University Center for Excellence in Disabilities. The WVATS' role is to provide access to and help with the acquisition of AT devices and services for individuals with disabilities. WVATS also provides device demonstrations, device loans, training, AT information, and technical assistance.

DRS has a rehabilitation technology unit which provides AT consultations and solutions to eligible VR consumers with AT needs statewide. With the coordination of services between DRS and WVATS, assurances are made that needed AT solutions can be provided to individuals with disabilities.

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

DRS has approximately 26 Branch office locations, providing statewide coverage. These offices are able to serve individuals with disabilities, including those individuals from minority backgrounds, in all areas of the state. Many cities within West Virginia which have relatively high minority populations (e.g., Charleston, Huntington, and Beckley) have a DRS branch office located within.

Additionally, DRS will continue to utilize tools and techniques which have allowed the agency to have success in its outreach to minority populations, such as:

- DRS will continue to use geographic information systems (GIS), as appropriate, to pinpoint geographic locations with potentially underserved minority populations in the State. This will allow for more effective and efficient outreach to those populations.
- DRS will continue to depend on local outreach efforts by branch office field staff to bring individuals with disabilities, including those individuals from minority backgrounds, into the VR system.

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)

DRS Goal 1 – Provide integrated vocational rehabilitation services to West Virginians with disabilities to promote attainment of a high school education or greater, in order to increase their ability to move through meaningful career pathways.

DRS will continue to monitor the educational achievement of all of its consumers, especially those in the TY population. Youth have become a primary focus in vocational rehabilitation and DRS will work closely and diligently with State and Local Education Agencies to ensure that its TY population receives the services that it needs, including Pre-ETS for students with disabilities. Each high school in West Virginia has a DRS counselor assigned to it to guarantee the service provision of students with disabilities. A greater emphasis is now being placed for counselors to do outreach with these students and their parents/guardians during their freshman and sophomore years (rather than their junior year, as was formerly practiced) in order to maximize the counseling opportunities.

DRS counselors will continue to take part in the IEP development of students with disabilities when they are invited to do so. Counselors will also stay in contact with educators to discuss and resolve educational difficulties as they arise. DRS will also work closely with West Virginia Adult Education, referring consumers as needed, to ensure that individuals with disabilities have an adequate opportunity to obtain a completed high school level education.

DRS Goal 2 – Provide Pre-ETS to students with disabilities.

The 2018 CSNA indicated that job exploration counseling was the most frequently reported Pre-ETS need. In accordance with this, and per the requirements of WIOA, DRS counselors in high schools will provide Pre-ETS to students with disabilities, especially job exploration counseling, in order to give students with disabilities and their parents/guardians a better understanding of labor market conditions, current and emerging career opportunities, and the necessary education and training requirements related to those opportunities.

DRS will continue to work closely with the West Virginia Office of Special Education to ensure that special education teachers, parents, and students with disabilities are aware of the availability of Pre-ETS. This work will continue through joint-training conferences with special education staff from across the state. Additional, intensive training on the Pathways to the Future Pre-ETS website will also continue to be provided to special education teachers in upcoming years. As part of its outreach campaign, DRS will continue to place large banners in high schools and distribute Pre-ETS materials to students with disabilities across the state.

In addition to ongoing program activities, DRS will continue to sponsor the CEO Summits, four-day summer workshops for students with disabilities statewide. The CEO Summits will be held

in multiple locations across the state to ensure statewide coverage. DRS will utilize the assistance of CRPs to conduct the Summit activities. Class size for each of the Summits will be approximately 20 students. Students will earn a stipend for the time that they attend. DRS will also request WorkForce WV and WV Adult Education to participate in the Summits to provide additional information to the students.

Topics to be covered:

- Career planning
- Career preparation
- SSI/SSDI Information
- Understanding the importance of necessary personal documents (e.g., social security card, driver's license, birth certificate, pay stubs).
- Communication
- Conflict Management
- Employer Expectations
- Attendance and Punctuality
- Timeliness of task completion
- Be able to work without supervision
- Positive work ethic
- Manage multiple tasks
- High-growth Jobs
- Personal Brand
- Job Hunting Tools – resumes, cover letters, interviews, and digital profiles

5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE

As described in Description J, DRS' direct client services units located at DRS' Nitro location will continue to be critical for DRS to meet the needs of individuals with disabilities identified under the unserved and underserved portion of this assessment, including individuals with disabilities who live in the rural part of the State, blind and visually impaired individuals, and the deaf and hard of hearing. The DRS Environmental Modifications Unit provides consumer services to assure they have the highest level of independence in and around their home and work by providing evaluations, technical assistance, and modifications. The continual maintenance and improvement of direct client services units located at DRS' Nitro location will be necessary to maintain its operation in the most efficient and cost-effective manner possible.

A large amount of the success that DRS has in its mission to enable and empower individuals with disabilities to work and to live independently hinges on its relationships with CRPs. In recent years, DRS has worked closely with CRPs across the state to increase the availability of Pre-ETS, including CEO summits. Because of the positive working relationship, DRS and CRPs were able to conduct CEO summits in 60 locations across the state. Improvements in efficiency of

service delivery has also resulted in reduced costs for services while also expanding availability across the state.

In general, DRS has good working relationships with the various CRPs throughout the State. However, CSNA results suggest that improvements can be made, particularly in specific geographic areas. To facilitate this improvement, DRS has established a number of strategies to put into action:

- Continue to educate field staff, especially the new counselors, about CRPs and their services. Use of the new 'CRP Locator' tool (a web-based, user-friendly, vendor guide) and counselor CRP site visits will increase awareness of available service options, which will help to maintain collaborative relationships with CRPs and enhance the availability of services to DRS consumers.
- Continue to maintain regular communications between DRS and community providers in each district and at the state level. Each DRS district will continue to host joint meetings with DRS district and branch office staff and CRPs in those districts to provide opportunities for CRP representatives and DRS personnel to discuss local service needs of DRS consumers. Subsequent to each meeting, the local DRS office will be required to send a brief report to the CRP Program Manager. This process will allow all parties involved in the expansion of community-based services to be kept informed of progress and issues. The Division will continue to examine the information and recommendations collected from various meetings between CRP and DRS staff members.

Progress on communication will continue to be made as the Division acquires more understanding of the issues and barriers facing the CRP and DRS staff members in their service provision to persons with significant disabilities in WV. Ongoing communication activities with CRPs also will include:

- An e-mail list-serve with all current vendors that will be updated periodically and utilized to send out training opportunities, policy changes, and general updates when needed.
- DRS counselors in each district will continue to be assigned as liaisons to each CRP and will continue to be required to complete a monthly update regarding the CRP. They will collect this information by visits and/or phone calls. Having CRP liaisons that regularly discuss service-related issues specific to the local service area(s) will aid in maintaining collaborative working relationships and enhancing the availability of services to consumers.
- Two rehabilitation specialists covering all districts in the state will provide technical assistance to CRPs and DRS staff. They will make site visits to CRP and DRS district and branch offices. During these visits, they will provide technical assistance and schedule training and other meetings that need to occur. They will serve as a communication link when issues arise and make themselves available to attend the communication meetings and transition team meetings.
- Conduct site visits to ensure that community providers continue to meet DRS standards and requirements.
- Increase the service provision of acknowledged vendors and work with community providers to expand their service areas to enhance the availability of community services within needed areas.

- Continue to conduct Transition Team meetings at the district level with DRS, WV Department of Education, and CRP staff members. The meetings will be held to promote interagency collaboration by allowing staff from each agency/CRP to become familiar with the different eligibility requirements and service definitions across agencies.
- Continue to conduct cross training and face-to-face meetings with community partners at the local level.
- Continue to assign liaison responsibilities to staff members and provide them guidance about the purpose of DRS participation in community events.
- Monitor the DRS counselors/supervisors/managers' perception of the quality of CRP services through a survey instrument.
- Monitor and assess the impact of the Quality Assurance unit on the counselor's case management practices by using data generated from the quality assurance specialists' review of cases.

6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA

DRS acknowledges the legal requirement to report on the performance accountability indicators under Section 116 of WIOA. However, data collection on the performance accountability indicators is only beginning, making a full report of DRS performance impossible at this time. As DRS moves forward in its task to place individuals with disabilities into competitive, integrated employment in program year (PY) 2020, it will continue to collect and monitor participant data in order to generate reports on:

- The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program;
- The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program;
- The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program;
- The percentage of program participants who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent, during participation in or within 1 year after exit from the program;
- The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains toward such a credential or employment; and
- The indicators of effectiveness in serving employers.

For PY 2018, DRS achieved the following performance on the performance accountability indicators under section 116 of WIOA:

- The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program - 61.8%
- The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program - \$4,595.70

- The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains toward such a credential or employment – 56.8%

7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES

Jobs and Hope West Virginia

Jobs & Hope West Virginia is the State's comprehensive response to the substance use disorder crisis. Established by Governor Jim Justice and the West Virginia Legislature, this program offers support through a statewide collaboration of agencies that provide West Virginians in recovery the opportunity to obtain career training and to ultimately secure meaningful employment. DRS is a proud Jobs and Hope partner agency and will continue to provide referrals, information, and services, as appropriate. As of December 2019, in addition to DRS, other Jobs and Hope West Virginia partner agencies include the:

- WV Department of Education;
- WV Department of Health and Human Resources;
- WorkForce WV;
- WV Community and Technical College System;
- WV National Guard;
- WV Higher Education Policy Commission;
- WV Department of Transportation;
- WV Office of Technology;
- WV Department of Military Affairs and Public Safety;
- WV Division of Motor Vehicles;
- WV Supreme Court of Appeals;
- Herbert Henderson Office of Minority Affairs;
- WV State Policy;
- WV Department of Commerce; and the
- WV Department of Veterans Assistance Collaboration with WorkForce WV

DRS will maintain regular communication with WorkForce WV to stay abreast of trends in employment, including changes in education and training requirements. This will be accomplished through regular meetings of the WDS, written communications, teleconferences, and other media, as appropriate. DRS, particularly through its employment specialists, will also stay informed of emerging careers and occupations via WorkForce WV's Labor Market Information website. DRS employment specialists continuously collect employment information from their business contacts. This information, including job orders for open positions, is immediately input into the WorkForce WV's online MACC system and shared within the WDS.

DRS will continue to serve on BSTs with WorkForce WV, Adult Education, local workforce development boards, and other related entities. Through training and standardizing

informational materials, when possible, these teams provide a full range of WDS information when making visits to employers. This will allow the WDS to maximize the impact of employer visits and ensure that businesses are aware of all resources available through the WDS.

Use of DRS Employment Specialists

DRS will continue to use its employment specialists to gather information regarding employers at the local level, including information regarding job placements for individuals with disabilities and regarding current and expected employer needs.

DRS has an in-house Employer Services Section that specializes in providing employers with disability-related information, services, and pre-screened job seekers. The DRS Employer Services Section has 9 employment specialists that cover all 55 counties in West Virginia. DRS' team of employment specialists provide business owners and employers with critical business options and assistance in staffing, employee retention strategies, education on disability-related issues, job accommodations, and information about financial incentives for employers who hire individuals with disabilities.

Direct contact with employers is a key strategy to identify competitive integrated employment and career exploration opportunities for VR consumers, including students with disabilities. Employment specialists therefore contact employers directly to identify current and future job openings. To facilitate this, DRS utilizes labor market information provided by WorkForce WV to identify the top employers in each county; contact is always made with the top ten employers in each county. When meeting with employers, employment specialists provide valuable information, including the DRS Employer Resource Guide. The resource guide provides the following information:

- Staffing services
- Training programs and incentives for hiring people with disabilities
- Financial incentives
- Accessibility assessments
- Accommodating employees with disabilities
- Basic disability etiquette
- Attitudinal barriers
- Americans with Disabilities Act
- Locating a DRS office
- Where to find additional resources

The Employer Services Section maintains a database of each DRS-employer interaction with VR employment specialists. The information collected includes the business name, contact person, and current job openings by occupation. If needed, a referral to the DRS Rehabilitation Technology Unit is made to address workplace accommodations. This list is distributed to field staff to potentially match a job-ready VR consumer with a current job opening. Through positive working relationships, 47 employers, including some of the largest in the state, now send job postings directly to DRS' Employer Services Section.

The Employer Services Section also works with employers to better serve transitioning youth with disabilities, including providing career exploration opportunities for students with disabilities. In 2015, DRS debuted the POWER program. POWER is a job shadowing program that offers transitioning students, who may be having a difficult time choosing a career path, the opportunity to experience an occupation by spending time with a professional working in the students' vocational goal/career field of interest. The POWER program allows the student the opportunity to experience an occupation prior to committing to training. It guides the student to take a serious, realistic look at the occupation, allowing the student to make a more informed choice. As of November 2019, 85 employers have agreed to host job shadowing experiences with DRS' POWER program.

8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

DRS Goal 1 – Provide integrated vocational rehabilitation services to West Virginians with disabilities to promote attainment of a high school education or greater, in order to increase their ability to move through meaningful career pathways.

DRS will continue to monitor the educational achievement of all of its consumers, especially those in the TY population. Youth have become a primary focus in vocational rehabilitation and DRS will work closely and diligently with State and Local Education Agencies to ensure that its TY population receives the services that it needs, including Pre-ETS for students with disabilities. Each high school in WV has a DRS counselor assigned to it to guarantee the service provision of students with disabilities. A greater emphasis is now being placed for counselors to do outreach with these students and their parents/guardians during their freshman and sophomore years (rather than their junior year, as was formerly practiced) in order to maximize the counseling opportunities.

DRS counselors will continue to take part in IEP development of students with disabilities when they are invited to do so. Counselors will also stay in contact with educators to discuss and resolve educational difficulties as they arise. DRS will also work closely with WV Adult Education, referring consumers as needed, to ensure that individuals with disabilities have an adequate opportunity to obtain a completed high school level education.

DRS Goal 2 – Provide Pre-ETS to students with disabilities.

The 2018 CSNA indicated that job exploration counseling was the most frequently reported Pre-ETS need. In accordance with this, and per the requirements of WIOA, DRS counselors in high schools will provide Pre-ETS to students with disabilities, especially job exploration counseling, in order to give students with disabilities and their parents/guardians a better understanding of labor market conditions, current and emerging career opportunities, and the necessary education and training requirements related to those opportunities.

DRS will continue to work closely with the WV Office of Special Education to ensure that special education teachers, parents, and students with disabilities are aware of the availability of Pre-ETS. This work will continue through joint-training conferences with special education staff from across the state. Additional, intensive training on the Pathways to the Future Pre-ETS website will also continue to be provided to special education teachers in upcoming years. As part of its outreach campaign, DRS will continue to place large banners in high schools and distribute Pre-ETS materials to students with disabilities across the state.

In addition to ongoing program activities, DRS will continue to sponsor the CEO Summits, four-day summer workshops students with disabilities statewide. The CEO Summits will be held in multiple locations across the state to ensure statewide coverage. DRS will utilize the assistance of CRPs to conduct the Summit activities. Class size for each of the Summits will be approximately 20 students. Students will earn a stipend for the time that they attend. DRS will also request WorkForce WV and WV Adult Education to participate in the Summits to provide additional information to the students.

Topics to be covered:

- Career planning
- Career preparation
- SSI/SSDI Information
- Understanding the importance of necessary personal documents (e.g., social security card, driver's license, birth certificate, pay stubs).
- Communication
- Conflict Management
- Employer Expectations
- Attendance and Punctuality
- Timeliness of task completion
- Be able to work without supervision
- Positive work ethic
- Manage multiple tasks
- High-growth Jobs
- Personal Brand
- Job Hunting Tools –resumes, cover letters, interviews, and digital profiles

DRS Goal 3 – Provide integrated vocational rehabilitation services to West Virginians with disabilities, committing to the use of the Employment First framework, to enable them to obtain competitive, integrated employment, especially in occupations and careers within emerging industries statewide.

Collaboration with WorkForce WV

DRS will maintain regular communication with WorkForce WV to stay abreast of trends in employment, including changes in education and training requirements. This will be accomplished through regular meetings of the WDS, written communications, teleconferences, and other media, as appropriate. DRS, particularly through its employment specialists, will also stay informed of emerging careers and occupations via WorkForce WV's Labor Market Information website. DRS employment specialists continuously collect employment information from their business contacts. This information, including job orders for open positions, is immediately input into the WorkForce WV's online MACC system and shared within the WDS.

DRS will continue to serve on BSTs with WorkForce WV, Adult Education, local workforce development boards, and other related entities. Through training and standardizing informational materials, when possible, these teams provide a full range of WDS information when making visits to employers. This will allow the WDS to maximize the impact of employer visits and ensure that businesses are aware of all resources available through the WDS.

Use of DRS Employment Specialists

DRS will continue to use its employment specialists to gather information regarding employers at the local level, including information regarding job placements for individuals with disabilities and regarding current and expected employer needs.

DRS has an in-house Employer Services Section that specializes in providing employers with disability-related information, services, and pre-screened job seekers. The DRS Employer Services Section has 9 employment specialists that cover all 55 counties in West Virginia. DRS' team of employment specialists provide business owners and employers with critical business options and assistance in staffing, employee retention strategies, education on disability-related issues, job accommodations, and information about financial incentives for employers who hire individuals with disabilities.

Direct contact with employers is a key strategy to identify competitive integrated employment and career exploration opportunities for VR consumers, including students with disabilities. Employment specialists therefore contact employers directly to identify current and future job openings. To facilitate this, DRS utilizes labor market information provided by WorkForce WV to identify the top employers in each county; contact is always made with the top ten employers in each county. When meeting with employers, employment specialists provide valuable information, including the DRS Employer Resource Guide. The resource guide provides the following information:

- Staffing services
- Training programs and incentives for hiring people with disabilities
- Financial incentives
- Accessibility assessments
- Accommodating employees with disabilities
- Basic disability etiquette
- Attitudinal barriers
- Americans with Disabilities Act
- Locating a DRS office
- Where to find additional resources

The Employer Services Section maintains a database of each DRS-employer interaction with VR employment specialists. The information collected includes the business name, contact person, and current job openings by occupation. If needed, a referral to the DRS Rehabilitation Technology Unit is made to address workplace accommodations. This list is distributed to field staff to potentially match a job-ready VR consumer with a current job opening. Through positive working relationships, 47 employers, including some of the largest in the state, now send job postings directly to DRS' Employer Services Section.

The Employer Services Section also works with employers to better serve transitioning youth with disabilities, including providing career exploration opportunities for students with disabilities. In 2015, DRS debuted the POWER program. POWER is a job shadowing program that offers transitioning students, who may be having a difficult time choosing a career path, the opportunity to experience an occupation by spending time with a professional working in the students' vocational goal/career field of interest. The POWER program allows the student the opportunity to experience an occupation prior to committing to training. It guides the student to take a serious, realistic look at the occupation, allowing the student to make a more informed choice. As of November 2019, 85 employers have agreed to host job shadowing experiences with DRS' POWER program.

Assistive Technology

DRS will continue to provide rehabilitation technology solutions to individuals with disabilities as needed so that those individuals can become employed or maintain employment. DRS has developed working relationships and agreements for the coordination of activities with the WVATS of the West Virginia University Center for Excellence in Disabilities. The WVATS' role is to provide access to and help with the acquisition of AT devices and services for individuals with disabilities. WVATS also provides device demonstrations, device loans, training, AT information, and technical assistance.

DRS has a rehabilitation technology unit which provides AT consultations and solutions to eligible VR consumers with AT needs statewide. With the coordination of services between DRS and WVATS, assurances are made that needed AT solutions can be provided to individuals with disabilities.

DRS Goal 4 – Improve access and availability of transportation options for DRS consumers who need transportation assistance to achieve or maintain competitive, integrated employment.

Transportation is an ongoing issue for West Virginians with disabilities, due to the rural nature of the state. A large proportion of the State's inhabitants live far away from jobs, agency offices, and other resources. DRS continues its commitment to reduce transportation barriers for consumers with disabilities and focuses on ITS to satisfy immediate transportation needs. To help reduce these barriers, DRS counselors will encourage planning for transportation needs early in the development of a consumer's rehabilitation program. At application, counselors will identify transportation issues and focus on finding solutions to include in the consumer's IPE. This will ensure that the ability of consumers to reach their vocational goal is not impeded by preventable transportation barriers. Transportation issues also will be addressed by the standard instrument prescribed for routine use by supervisors and quality assurance staff in case reviews. Beyond ITS, DRS will continue to assign responsibility to a staff member in each branch office to maintain a list and working knowledge of local transportation options and will continue to participate in local and state initiatives to coordinate and expand transportation resources.

DRS Goal 5 – Continue to build collaborative relationships with community providers [including CRPs, Independent Living, and other community providers] to enhance the availability of services to DRS consumers. A large amount of the success that DRS has in its mission to enable and empower individuals with disabilities to work and to live independently hinges on its relationships with CRPs. In general, DRS has good working relationships with the various CRPs throughout the State. However, CSNA results suggest that improvements can be made, particularly in specific geographic areas. To facilitate this improvement, DRS has established a number of strategies to put into action:

- Continue to educate field staff, especially the new counselors, about CRPs and their services. Use of the new 'CRP Locator' tool (a web-based, user-friendly vendor guide) and counselor CRP site visits will increase awareness of available service options, which will help to maintain collaborative relationships with CRPs and enhance the availability of services to DRS consumers.
- Continue to maintain regular communications between DRS and community providers in each district and at the state level. Each DRS district will continue to host joint meetings with DRS district and branch office staff and CRPs in those districts to provide opportunities for CRP representatives and DRS personnel to discuss local service needs of DRS consumers. Subsequent to each meeting, the local DRS office will be required to send a brief report to the CRP Program Manager. This process will allow all parties involved in the expansion of community-based services to be kept informed of progress and issues. The Division will continue to examine the information and recommendations collected from various meetings between CRP and DRS staff members.

Progress on communication will continue to be made as the Division acquires more understanding of the issues and barriers facing the CRP and DRS staff members in their service provision to persons with significant disabilities in WV. Ongoing communication activities with CRPs also will include:

- An e-mail list-serve with all current vendors that will be updated periodically and utilized to send out training opportunities, policy changes, and general updates when needed.
- DRS counselors in each district will continue to be assigned as liaisons to each CRP and will continue to be required to complete a monthly update regarding the CRP. They will collect this information by visits and/or phone calls. Having CRP liaisons that regularly discuss service-related issues specific to the local service area(s) will aid in maintaining collaborative working relationships and enhancing the availability of services to consumers.
- Two rehabilitation specialists covering all districts in the state will provide technical assistance to CRPs and DRS staff. They will make site visits to CRP and DRS district and branch offices. During these visits, they will provide technical assistance and schedule training and other meetings that need to occur. They will serve as a communication link when issues arise and make themselves available to attend the communication meetings and transition team meetings.
- Conduct site visits to ensure that community providers continue to meet DRS standards and requirements.
- Increase the service provision of acknowledged vendors and work with community providers to expand their service areas to enhance the availability of community services within needed areas.
- Continue to conduct Transition Team meetings at the district level with DRS, WV Department of Education, and CRP staff members. The meetings will be held to promote interagency collaboration by allowing staff from each agency/CRP to become familiar with the different eligibility requirements and service definitions across agencies.
- Continue to conduct cross training and face-to-face meetings with community partners at the local level.

- Continue to assign liaison responsibilities to staff members and provide them guidance about the purpose of DRS participation in community events.
- Monitor the DRS counselors/supervisors/managers' perception of the quality of CRP services through a survey instrument.
- Monitor and assess the impact of the Quality Assurance unit on the counselor's case management practices by using data generated from the quality assurance specialists' review of cases.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

To foster a customer-focused approach to VR services, DRS works with the WV State Rehabilitation Council and Statewide Independent Living Council and uses innovation and expansion (I&E) resources to support the activities of these groups. As appropriate, DRS will continue to use I&E funds to discover, generate, and improve upon service delivery processes to individuals with disabilities. Additionally, with the emphasis on Pre-ETS to students with disabilities now in place by WIOA, there are significant opportunities for discoveries that can be made using I&E resources.

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.

DRS has approximately 26 Branch office locations, providing statewide coverage. These offices are able to serve individuals with disabilities, including those individuals from minority backgrounds, in all areas of the state. Many cities within WV which have a relatively high proportion of minorities in the population (e.g., Charleston, Huntington, and Beckley) have a DRS branch office located within.

DRS also has a significant presence in state colleges and high schools with significant minority populations in all 55 counties of WV.

Due to the rural nature of the state, support for transportation is very important for access to VR services by individuals with disabilities. DRS continues to recognize this barrier as a challenge to VR service delivery statewide. DRS is committed to continuing its pursuit of individualized transportation solutions for its consumers, including those from minority backgrounds.

Additionally, DRS will continue to utilize tools and techniques which have allowed the agency to have success in its outreach to minority populations, such as:

- DRS will continue to use GIS, as appropriate, to pinpoint geographic locations with potentially underserved minority populations in the State. This will allow for more effective and efficient outreach to those populations.
- DRS will continue to depend on local outreach efforts by branch office field staff to bring individuals with disabilities, including those individuals from minority backgrounds, into the VR system.

P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

Describe:

1. AN EVALUATION OF THE EXTENT TO WHICH THE VR PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS

The following description includes progress in the achievement of the goals for the West Virginia Division of Rehabilitation Services (DRS).

DRS Goal 1 – Provide integrated vocational rehabilitation (VR) services to West Virginians with disabilities to enable them to attain a high school education or greater.

Since the writing of the previous State Plan, the percentage of West Virginians with disabilities having high school diplomas appears to have increased. As of 2017 (most recent data; posted in 2018 Annual Disability Statistics Compendium), high school graduates include 75.6% of individuals with disabilities aged 25 years and older, compared to 69.4% four years earlier.

DRS has worked hard to strengthen its relationship with State and Local Education Agencies and has sought to increase its service capacity to students with disabilities statewide. This includes formal agreements and Memorandums of Understanding (MOUs), the provision of Pre-employment Transition Services (Pre-ETS) in and outside of school settings, the continuation of DRS' Student Transition to Employment Program (STEP), and coordinated training with Special Education teachers statewide.

DRS monitored the educational achievement of all of its consumers, especially those in the transition youth (TY) population. DRS worked closely and diligently with State and Local Education Agencies to ensure that its TY population receives the services that it needs, including pre-employment transition services for high school students with disabilities. DRS assigned a counselor to each high school in WV to enhance the service provision of students with disabilities. A greater emphasis is now being placed for counselors to do outreach with these students and their parents/guardians during their sophomore year (rather than their junior year, as was formerly practiced) in order to maximize the counseling opportunities.

DRS counselors took part in the Individualized Education Program (IEP) development of students with disabilities when invited to do so. Counselors stayed in contact with educators to discuss and resolve educational difficulties as needed. DRS also worked closely with WV Adult Education, referring consumers as needed, to ensure that individuals with disabilities have an adequate opportunity to obtain a completed high school level education. DRS will continue to conduct these activities as part of its progress toward achievement of this goal.

DRS Goal 2 – Provide Pre-ETS to students with disabilities.

DRS has demonstrated considerable commitment to providing Pre-ETS to students with disabilities statewide since the implementation of WIOA. In collaboration with Community Access, Incorporated (CAI) and Terzetto Creative, LLC, DRS established the Pathways to the Future website (www.pathwayswv.org), designed to operate as a self-service one-stop for students, parents, and educators in the provision of Pre-ETS that can be accessed at any time. The site provides extensive information and resources regarding career planning, education planning, independent living skills, self-determination, and work-based learning.

Beyond this self-service portal, DRS has been active, both within and outside of school settings to ensure that students with disabilities statewide receive the Pre-ETS needed to promote a more well-informed student base regarding employment, career pathways, independent living and

soft skills, and self-advocacy. Numerous initiatives and activities, provided by DRS staff, Education staff, and Community Rehabilitation Programs (CRPs), have been delivered to thousands of students across the state in all 55 counties. In doing so, DRS has consistently been able to successfully reserve and spend the WIOA-mandated 15% earmark of federal funds on Pre-ETS. Some of the activities conducted by the agency include:

- Career Exploration Opportunity (CEO) Summits – DRS, in conjunction with CRPs, hosts several Summits each year, during the summer, serving hundreds of high school students from across the state. The four-day summits provide tools and information to support students in obtaining long-term career success. The curriculum includes career planning and preparation, self-assessments, completing job applications, interviewing skills, how to dress for employment, work ethic, cell phone and internet safety, and self-advocacy.
- Positive Outcomes Within Education and Rehabilitation (POWER) program – DRS’ job shadowing program. POWER offers DRS transition students who are interested in professional careers an opportunity to spend a few hours or a day with a skilled worker in the student’s vocational field of interest, allowing the student to explore a specific career of interest by observing an employee perform his or her work duties at his or her place of employment. The experience should provide realistic career information that will aid the student in making career choices.
- Work-Based Learning Experiences – Provided in conjunction with CRPs to pair students with disabilities with local employers willing to provide a short-term employment opportunity. These experiences provide the student with real-world work experience, in an integrated job site. Students work up to 80 work hours, over 2 – 4 weeks, earning no less than minimum wage. The CRPs are paid to arrange and monitor the experience, as well as pay the students.

The 2018 comprehensive statewide needs assessment (CSNA) indicated that job exploration counseling was the most frequently reported pre-employment transition service need. DRS counselors provided Pre-ETS to students with disabilities, especially job exploration counseling, in order to give students with disabilities and their parents/guardians a better understanding of labor market conditions, current and emerging career opportunities, and the necessary education and training requirements related to those opportunities. In program year (PY) 2018, DRS provided Pre-ETS to over 1,000 students with disabilities in WV.

In addition to ongoing program activities, DRS hosted summer workshops (CEO Summits) for transition students entering into their senior year of high school. In 2018, the CEO Summits were held in 11 areas across the state; in 2019, the Summits were held in 60 areas. In 2019, DRS worked with CRPs around the state to provide the Summits in as many local areas as possible. Attendance for the CEO Summits in the summer of 2019 was approximately 1,000 students, covering all six DRS districts. Students earned a stipend for the time that they attended. A concerted effort was made to introduce Science, Technology, Engineering, Arts, and Math (STEAM) to students in the CEO Summits.

Topics covered included career planning, career preparation, SSI/SSDI Information, understanding the importance of necessary personal documents, communication, conflict management, employer expectations, attendance and punctuality, timeliness of task completion, being able to work without supervision, positive work ethic, managing multiple tasks, high-growth jobs, personal brand, and job hunting tools such as resumes, cover letters, interviews, and digital profiles.

In collaboration with CRPs, the Statewide independent Living Council (SILC) and the WV Centers for Independent Living (CILs), DRS established programs in the summer of 2019 which provided Instruction in Self-Advocacy at 25 locations across the state, serving 294 students with disabilities. These programs provide students with disabilities with the skills necessary to be confident and self-directed self-advocates. Students participating in the programs learned about their legal rights and responsibilities, the history of the disability movement, the Individuals with Disabilities Education Act (IDEA), Section 504, the Americans with Disabilities Act (ADA), IEPs, and participated in activities to develop their confidence and communication skills, as well as the ability to evaluate their future needs and plans.

In an effort to promote Science, Technology, Engineering, and Math (STEM) fields, DRS sponsored a “Build It, Keep It, Share It” – BIKISI – program in the summer of 2019. In the program, through a one-week training, students receive the knowledge, tools, and components they need to build a computer. At the end of the training, they take the knowledge – and the computer – home with them. The program is designed to develop student interest in the sciences through computers, to subsequently promote interest in high-paying jobs within in-demand job sectors. In 2019, the program was held in 12 locations and served 363 students with disabilities.

Throughout the academic year, DRS Employment Specialists also provided Pre-ETS at the local high schools. The Employment Specialists conducted mock interviewing, career exploration, and other employment related topics. The POWER program provides students that ability to job shadow careers that they are interested in. The Employment Specialists have worked to identify a vast array of employers located throughout the State. There are currently 85 employers involved in the POWER Program.

In 2016 and 2017, DRS partnered with CAI to implement a program, entitled “Pathways to the Future,” to support the design and implementation of programming and outreach while addressing the new direction mandated by WIOA. Specifically, the program addressed the five required Pre-ETS for high school students with disabilities through an expansion of the STEP. The program assisted school districts by offering training and technical assistance in setting up community-based work experience programs for students with disabilities. The project helped level the playing field between resource-rich metropolitan areas and isolated rural settings that often have few services available. In addition, a strong statewide outreach to teachers, parents, students, and other VR stakeholders was a component of the project. The project had the following goals:

1. To assist school districts in setting up community-based Work Exploration programs.
2. To develop statewide parent training network utilizing the Parent Community Resource Centers.
3. To develop a network of specialists to work with DRS, WorkForce WV, and WV Department of Education (WVDE) staff.
4. To develop a statewide cross-sector outreach program with a strong emphasis on traditionally underserved populations.

DRS enlisted the services of Terzetto Creative to create/maintain a “Pathways to the Future” website (www.pathwayswv.org), which serves as a self-service resource for students with disabilities statewide to receive Pre-ETS. The website provides valuable information and tools regarding career planning, education planning, independent living, self-determination, and work-based learning. The website was bolstered by banners that were placed in high schools in all 55 counties of the state. Additionally, several pages of the College Foundation of West

Virginia's website (www.cfvy.com) have links to the Pathways website. These banners and links directed students with disabilities to the website and its resources.

DRS Goal 3 – Provide integrated vocational rehabilitation services to West Virginians with disabilities to enable them to obtain competitive employment, especially in occupations and careers within emerging industries statewide.

With the passage of WIOA, DRS has made several adjustments to its service provision model, including a greater emphasis toward youth and students with disabilities. Due to the legislative mandate of reserving and spending at least 15% of federal funds on the provision of Pre-ETS to students with disabilities, DRS has found it necessary to place VR-eligible individuals who do not have the most significant disabilities on a waitlist. However, if sufficient resources become available, individuals will be removed from the waitlist. Despite this difficulty, DRS has found success in its long-standing mission of empowering and enabling individuals with disabilities to work and to live independently. In Program Year (PY) 2018, DRS served 7,016 participants, including 5,469 youth with disabilities, while enabling 930 job seekers with disabilities to obtain or retain employment. Collaboration with WorkForce WV and Local Workforce Development Boards

DRS has maintained regular communication with WorkForce WV to stay abreast of trends in employment, including changes in education and training requirements. This has been accomplished through regular meetings of the workforce development system (WDS), written communications, teleconferences, and other media. DRS, particularly through its Employment Specialists, stayed informed of emerging careers and occupations via WorkForce WV's Labor Market Information website. DRS Employment Specialists have also continuously collected employment information from their business contacts. This information is shared within the WDS. DRS registers its job-ready consumers with WorkForce WV in order to better serve employers by providing them with a base of potential employees.

DRS maintained and continues to maintain a presence with each of West Virginia's seven Local Workforce Development Boards (WDBs): Region 1 WDB; Region 2 – South Western WV WDB, Inc.; Region 3 – WDB of Kanawha County, Inc.; Region 4 Mid-Ohio Valley WDB; Region 5 – Northern Panhandle WDB; Region 6 WDB, and Region 7 WDB. DRS has signed MOUs and Infrastructure Funding Agreements (IFAs) with each board. Each Local WDB has a DRS representative who is active in the Board's activities and decision-making process.

Use of DRS Employment Specialists

DRS used its Employment Specialists to gather information regarding employers at the local level, including information regarding job placements for individuals with disabilities and regarding current and expected employer needs.

DRS has an in-house Employer Services Section that specializes in providing employers with disability-related information, services, and pre-screened job seekers. The DRS Employer Services Section has nine Employment Specialists that cover all 55 counties in West Virginia. Each Employment Specialist has a unique understanding of local labor market information (LMI) including what jobs are available, what jobs are in demand or decline, and employer networks.

DRS' team of Employment Specialists provided business owners and employers with critical business options and assistance in staffing, employee retention strategies, education on disability-related issues, job accommodations, and information about financial incentives for employers who hire individuals with disabilities.

Direct contact with employers is a key strategy to identify competitive integrated employment and career exploration opportunities for VR consumers, including students with disabilities. Employment Specialists therefore contact employers directly to identify current and future job openings. To facilitate this, DRS utilizes labor market information provided by WorkForce WV to identify the top employers in each county; contact is always made with the top ten employers in each county. When meeting with employers, Employment Specialists provide valuable information, including the DRS Employer Resource Guide. The resource guide provides information regarding staffing services, training programs and incentives for hiring people with disabilities, financial incentives, accessibility assessments, accommodating employees with disabilities, basic disability etiquette, attitudinal barriers, the Americans with Disabilities Act, locating a DRS office, and where to find additional resources. DRS Employment Specialists conducted over 800 employer visits with more than 500 employers in Program Year 2018.

The Employer Services Section maintains a database of each DRS-employer interaction with VR employment specialists. The information collected includes the business name, contact person, and current job openings by occupation. If needed, a referral to the DRS Rehabilitation Technology Unit is made to address workplace accommodations. This list is distributed to Counselors to potentially match a job-ready VR consumer with a current job opening. Through positive working relationships, 47 employers, including some of the largest in the state, now send job postings directly to DRS' Employer Services Section.

The Employer Services Section also worked with employers to better serve transitioning youth with disabilities, including providing career exploration opportunities for students with disabilities through the POWER program. POWER is a job shadowing program that offers transitioning students, who may be having a difficult time choosing a career path, the opportunity to experience an occupation by spending time with a professional working in the students' vocational goal/career field of interest. The POWER program allows the student the opportunity to experience an occupation prior to committing to training. It guides the student to take a serious, realistic look at the occupation, allowing the student to make a more informed choice. Currently, there are 85 employers statewide that participate in the POWER program.

Assistive Technology

DRS provided rehabilitation technology solutions to individuals with disabilities as needed so that those individuals could become employed or maintain employment. DRS has developed working relationships and agreements for the coordination of activities with the West Virginia Assistive Technology System (WVATS) of the West Virginia University Center for Excellence in Disabilities. The WVATS' role is to provide access to and help with the acquisition of assistive technology (AT) devices and services for individuals with disabilities. WVATS also provides device demonstrations, device loans, training, AT information, and technical assistance.

DRS has a rehabilitation technology unit which provided AT consultations and solutions to eligible VR consumers with AT needs statewide. With the coordination of services between DRS and WVATS, assurances are made that needed AT solutions can be provided to individuals with disabilities.

DRS Goal 4 – Improve access and availability of transportation options at the community level for DRS consumers who need transportation assistance to achieve or maintain competitive, integrated employment.

DRS continues to work toward finding individualized transportation solutions for West Virginians with disabilities as needed for their employment goals. In Program Year (PY) 2017,

DRS expended \$122,115 on transportation services for 891 consumers and in PY 2018, DRS authorized \$93,540 in transportation services for 746 consumers.

Transportation is an ongoing issue for West Virginians with disabilities, due to the rural nature of the state. A large proportion of the State's inhabitants live far away from jobs, agency offices, and other resources. DRS continued its commitment to reduce transportation barriers for consumers with disabilities and focused on individual transportation solutions (ITS) to satisfy immediate transportation needs. To help reduce these barriers, DRS counselors encouraged planning for transportation needs early in the development of a consumer's rehabilitation program. At application, counselors identified transportation issues and focused on finding solutions to include in the consumer's Individualized Plan for Employment (IPE). This ensured that the ability of consumers to reach their vocational goal was not impeded by preventable transportation barriers. Transportation issues were also addressed by the standard instrument prescribed for routine use by supervisors and quality assurance staff in case reviews. Beyond ITS, DRS continued to assign responsibility to a staff member in each branch office to maintain a list and working knowledge of local transportation options and continued to participate in local and state initiatives to coordinate and expand transportation resources. These activities will be ongoing as DRS strives to accomplish transportation access for all of its consumers in need.

DRS Goal 5 – Continue to build collaborative relationships with community providers (including CRPs, Independent Living, and other community providers) to enhance the availability of services to DRS consumers.

A comparison of findings from the 2015 CSNA and the 2018 CSNA indicates that there is still a need to continue to improve collaborative relationships with community providers. While a greater percentage of CRP survey respondents acknowledged that a DRS liaison counselor was in contact on a regular basis (i.e., 68.1% in 2015 vs. 78.4% in 2018), a lower percentage of CRP survey respondents rated their communication with DRS to be Good or better (91.5% in 2015 vs. 87.2% in 2018).

2015 – Forty-seven out of 47 CRPs/community service providers (CSPs) provided a rating of their communication with DRS. Rating options included Excellent, Very Good, Good, Poor, and Very Poor. No CRPs/CSPs gave a rating of Very Poor and 43 of the 47 CRPs/CSPs (91.5%) gave a response of Good or better. Additionally, CRPs/CSPs were asked whether a DRS liaison counselor was in contact on a regular basis. Thirty-two (32) CRPs/CSPs responded yes, while 15 CRPs/CSPs responded no (68.1% and 31.9%, respectively).

2018 - Thirty-nine out of 40 CRPs provided a rating of their communication with DRS. Options ranged from Excellent to Very Poor. One CRP gave a rating of Very Poor and 34 of the 39 CRPs (87.2%) gave a response of Good or better. When asked whether a DRS liaison counselor was in contact on a regular basis, 29 of 37 CRPs responded yes, while 8 CRPs responded no (78.4% and 21.6%, respectively). Three CRPs did not respond to this question.

DRS continues to utilize CRPs to provide services to its consumers. In PY 2017, DRS authorized \$3,017,766 in CRP services to 1,417 consumers. In PY 2018, DRS authorized \$2,582,420 in CRP services to 1,043 consumers. DRS continued to educate field staff, especially new counselors, about CRPs and their services. Use of the new 'CRP Locator' tool (a web-based, user-friendly, vendor guide) and counselor CRP site visits increased awareness of available service options, which helped to maintain collaborative relationships with CRPs and enhance the availability of services to DRS consumers. DRS continued to maintain regular communications with community providers in each district and at the state level. Progress on communication will continue to be

made as the Division acquires more understanding of the issues and barriers facing the CRP and DRS staff members in their service provision to persons with significant disabilities in WV.

Ongoing communication activities with CRPs also includes:

1. An e-mail list-serve with all current vendors that is updated periodically and utilized to send out training opportunities, policy changes, and general updates when needed.
2. DRS counselors in each district continue to be assigned as liaisons to each CRP and continue to be required to complete a monthly update regarding the CRP. They collect this information by visits and/or phone calls. Having CRP liaisons that regularly discuss service-related issues specific to the local service area(s) aids in maintaining collaborative working relationships and enhancing the availability of services to consumers.
3. Two Rehabilitation Specialists covering all districts in the state provide technical assistance to CRPs and DRS staff. They make site visits to CRP and DRS district and branch offices to ensure that community providers continue to meet DRS standards and requirements. During these visits, they provide technical assistance and schedule training and other meetings that need to occur. They serve as a communication link when issues arise and make themselves available to attend the communication meetings and transition team meetings.

Additionally, the agency works to:

- Increase the service provision of acknowledged vendors and work with community providers to expand their service areas to enhance the availability of community services within needed areas;
- Conduct Transition Team meetings at the district level with DRS, WV Department of Education, and CRP staff members. The meetings are held to promote interagency collaboration by allowing staff from each agency/CRP to become familiar with the different eligibility requirements and service definitions across agencies;
- Conduct cross training and face-to-face meetings with community partners at the local level;
- Assign liaison responsibilities to staff members and provide guidance about the purpose of DRS participation in community events;
- Monitor the DRS counselors/supervisors/managers' perception of the quality of CRP services through a survey instrument; and
- Monitor and assess the impact of the Quality Assurance unit on the counselor's case management practices by using data generated from the quality assurance specialists' review of cases.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

DRS continued to be successful in achieving the agency's goals and priorities. However, a high turnover rate of DRS staff, including VR counselors, presents a barrier to the full achievement of all goals and priorities. Because of this barrier, DRS will continue to maintain its goals and priorities relating to CRPs, transportation, and serving youth with disabilities until the desired outcomes are achieved.

The main impact of high turnover is the need to continually train and educate new staff members. Newly hired staff do not have a full understanding of available resources in their local area, including transportation and CRP services. This knowledge gap effects many areas of DRS activities and may unfortunately lead to lower levels of CRP utilization, local transportation options, and consumer satisfaction, especially among youth. However, DRS has worked and will continue working to mitigate these impediments to achieving its goals and priorities.

The high turnover rate, not just among DRS staff, but CRP staff as well, can negatively impact CRP service delivery and capacity across the state. For these reasons, DRS has maintained goals and priorities associated with improving the working relationships between DRS and CRP staff in addition to increasing the availability of CRP services within the community.

To combat transportation issues, DRS has continued its commitment to reduce transportation barriers for consumers with disabilities and its focus on ITS to satisfy immediate transportation needs. DRS also encouraged planning for transportation needs early in the development of the consumer's rehabilitation program. At application, DRS counselors identified transportation issues and focused on finding solutions to include in the consumer's IPE. This ensured that the ability of consumers to reach their vocational goal was not impeded by preventable transportation barriers. Transportation issues were also addressed by the standard instrument prescribed for routine use by supervisors and quality assurance staff in case reviews.

DRS is successfully moving forward, despite the barriers faced by the agency, and will continue to work toward successfully achieving all goals and priorities.

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
PROGRESS IN ACHIEVING THE SUPPORTED EMPLOYMENT GOALS**

The total authorized dollars for CRP supported employment (SE) services in Program Year (PY) 2018 was \$194,460 for 95 consumers with most significant disabilities. This is an increase from PY 2017, when 85 consumers were served and \$190,265 were authorized for CRP SE services.

As previously addressed in the discussion of DRS Goal 5, DRS continued to build collaborative relationships with community providers (including CRPs, Independent Living, and other community providers) to enhance the availability of services to DRS consumers. A comparison of findings from the 2015 CSNA and the 2018 CSNA indicates that there is still a need to continue to improve collaborative relationships with community providers. While a greater percentage of CRP survey respondents acknowledged that a DRS liaison counselor was in contact on a regular basis (i.e., 68.1% in 2015 vs. 78.4% in 2018), a lower percentage of CRP survey respondents rated their communication with DRS to be Good or better (91.5% in 2015 vs. 87.2% in 2018).

**B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND
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3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA

DRS acknowledges the legal requirement to report on the performance accountability indicators under Section 116 of WIOA. However, data collection on the performance accountability indicators is only beginning, making a full report of DRS performance impossible at this time. As DRS moves forward in its task to place individuals with disabilities into competitive, integrated employment in PY 2020, it will continue to collect and monitor participant data in order to generate reports on:

- The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program;
- The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program;
- The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program;
- The percentage of program participants who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent, during participation in or within 1 year after exit from the program;
- The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains toward such a credential or employment; and
- The indicators of effectiveness in serving employers.

For PY 2018, DRS achieved the following performance on the performance accountability indicators under section 116 of WIOA:

- The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program – 61.8%
- The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program – \$4,595.70
- The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains toward such a credential or employment – 56.8%

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED

UTILIZATION OF TITLE I FUNDS FOR INNOVATION AND EXPANSION ACTIVITIES

I&E FUNDS FOR THE WEST VIRGINIA STATE REHABILITATION COUNCIL AND WEST VIRGINIA STATEWIDE INDEPENDENT LIVING COUNCIL

DRS fully embraces the Congressional intent that individuals with disabilities and their advocates are full partners in the state rehabilitation program. Therefore, DRS has established a goal to improve its service delivery system through involvement of consumers and their advocates to increase the ease of access to, timeliness of, and quality of rehabilitation services and ultimately to improve employment outcomes for individuals with disabilities. The Division's concentration of I&E efforts on consumer partnerships demonstrates its commitment to enhanced consumer involvement.

Success in working with consumers and their advocates is fundamentally important in developing and using innovative approaches to achieve long-term success in expanding and improving rehabilitation services, including supported employment. DRS pursues that work primarily through partnership initiatives with the West Virginia State Rehabilitation Council (WV SRC) and the West Virginia Statewide Independent Living Council (SILC).

DRS believes that the activities of these councils provide a promising foundation for the kind of partnership envisioned by the Rehabilitation Act Amendments of 1998. If that partnership is to achieve its full potential, however, it must receive the necessary support.

Therefore, DRS annually allocates I&E funds to support general operations of the WV SRC and the SILC.

Program Year (PY) 2018 highlights for each appear below.

WEST VIRGINIA STATE REHABILITATION COUNCIL

I&E funds support operations and activities undertaken by members of the WV SRC, as mandated by WIOA. DRS allocated \$52,168 for WV SRC in PY 2019.

As required by the Rehabilitation Act Amendments of 1998, WV SRC assists DRS by conducting a survey of consumer satisfaction for DRS consumers whose VR cases have been closed. Surveys were mailed to approximately 3,800 individuals in PY 2019. WV SRC uses I&E funds to share costs of contracting an independent consultant to compile a report of survey results.

I&E funding assists WV SRC to prepare, publish, and distribute its annual report.

WV SRC also participates in development and establishment of DRS goals and priorities outlined in this state plan. I&E funds are used for travel costs as necessary.

WEST VIRGINIA STATEWIDE INDEPENDENT LIVING COUNCIL

In combination with Title VII money, I&E funds help support operations and activities undertaken by the SILC. DRS allocated \$228,900 for the SILC in PY 2019.

The SILC, in partnership with DRS, jointly develops and submits the State Plan for Independent Living (SPIL), as appropriate. The SILC continues to monitor and evaluate the implementation and effectiveness of the SPIL. In conjunction with DRS, the SILC prepares and submits the 704 Report for West Virginia.

SILC members and/or employees collaborate with and/or participate in activities of the WV Centers for Independent Living (WVCIL), WV Developmental Disabilities Council, WV SRC, WV Olmstead Council, WV Mental Health Consumers Association, WV American Association of Retired Persons (AARP), Medley Hartley Advocacy Project Advisory Council, WV Transportation

Alliance, and the Fair Shake Network. Training for service providers on sexual victimization of individuals with disabilities has been scheduled.

The SILC conducts a survey of consumer satisfaction for consumers who received independent living services. The SILC uses I&E funds to share costs with DRS and WVCIL for distribution of the survey and contracting an independent consultant to compile survey results and prepare an annual report of findings.

The SILC ensures that all meetings are open to the public and provides notice through the WV Secretary of State's Office as well as through statewide media at least two weeks prior to the meetings.

Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES

Include the following:

1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES

The West Virginia Division of Rehabilitation Services (DRS) vendor acknowledgment process includes an in-service training session for prospective new vendors and training updates as requested. During the training session, participants receive a Service Provider Guide and an introduction to the DRS process for providing supported employment (SE) services. DRS also loans SE training books and materials at no cost.

The quality of SE services is directly tied to the competency of the personnel performing job development and community-based training services. DRS encourages and supports the provision of a broad range of in-service training programs for personnel directly involved in SE service delivery.

DRS is committed to ensuring the availability of SE services throughout West Virginia as reflected in progress toward DRS Goal 5, which is to continue to build collaborative relationships with community providers including community rehabilitation programs (CRPs), Independent Living, and other community providers to enhance the availability of services to DRS consumers. There are currently 35 DRS-acknowledged SE vendors from all districts across the state. These vendors make SE services available to an increasing number of individuals with the most significant disabilities.

In accordance with federal regulations, the SE services that may be provided to individuals and youth with disabilities placed in SE include:

1. Evaluation of rehabilitation potential for SE to supplement the comprehensive assessment conducted under the Title I program;
2. Job development;
3. Job placement;
4. Intensive on-the-job training provided by skilled job coaches/employment specialists;
5. Case management services;
6. Job monitoring, whether performed on-site or off-site, that includes regular contact with employees, employers, parents, guardians, and other professionals to reinforce and maintain the job placement;

7. Rehabilitation technology assessment and services as appropriate; and
8. Post-employment services (following transition to extended SE services) that are available from the extended service provider and that are needed to maintain the SE job placement.

As appropriate, youth with disabilities placed in SE may receive transition services. Youth who meet the definition of a student with a disability may also receive pre-employment transition services that include:

1. Job exploration counseling;
2. Work-based learning experiences, which may include in-school or after school opportunities, or experience outside the traditional school setting (including internships), that is provided in an integrated environment to the maximum extent possible;
3. Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education;
4. Workplace readiness training to develop social skills and independent living; and
5. Instruction in self-advocacy, which may include peer mentoring.

The demand and need for SE services continues to be significant, particularly in rural areas, as well as for those individuals who are transitioning from school to the workforce. DRS continues its commitment to expanding the statewide capacity for SE services.

DRS will continue to provide SE services to its consumers and will acknowledge additional SE service providers where needed. The Division will continue to consider non-traditional approaches to SE service delivery and will increasingly emphasize the development of natural supports wherever possible. DRS anticipates that more individuals will receive services with the increased number of approved SE providers.

DRS authorized SE services to 95 individuals in Program Year 2018.

While SE services may be expected to vary in scope and duration from individual to individual, core services that may be provided to individuals and youth with disabilities placed in SE can include:

1. Assessment of the individual's environmental circumstances;
2. Job analysis and job development;
3. Rehabilitation technology assessment;
4. Job placement following appropriate match of job/consumer characteristics identified in during assessment, job analysis, and job development (services 1 and 2 above);
5. Intensive, one-on-one, on-the-job training;
6. Job stabilization, job coach fading as much as possible; and
7. Extended Supported Employment Services (ESES), optimally including natural supports.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES

DRS receives state funds earmarked to provide ESES for SE clients closed as successfully rehabilitated who, after an assessment of their progress and continuing needs for services, are found to require ongoing job coaching to maintain employment and are not eligible for services through other funding sources. The consumer's Individualized Plan for Employment (IPE) includes an estimate of the time needed for transition to extended services. Provision of ESES (job coaching) to all eligible SE clients, including youth with the most significant disabilities, in accordance with an approved IPE will not exceed 4 years, as required by federal regulations. Consumers in SE placement are eligible to receive any services traditionally available through the DRS Title I program.

VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS

States must provide written and signed certifications that:

1. THE (ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE,) IS AUTHORIZED TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN UNDER TITLE I OF THE REHABILITATION ACT OF 1973 (REHABILITATION ACT), AS AMENDED BY 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

West Virginia Division of Rehabilitation Services

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

West Virginia Department of Commerce

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

Marijane K. Waldron

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, West Virginia Division of Rehabilitation Services

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

[14] Public Law 113-128.

[15] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

[16] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[17] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[18] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations.

[19] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[20] Applicable regulations, in part, include the citations in footnote 6.

CERTIFICATION SIGNATURE

Signatory information Enter Signatory information in this column

Name of Signatory Marijane K. Waldron

Signatory information	Enter Signatory information in this column
Title of Signatory	Director, West Virginia Division of Rehabilitation Services
Date Signed	7-6-2021

ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: **The State Plan must provide assurances that:**

The State Plan must include	Include
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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
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3.b.(B) "has established a State Rehabilitation Council" (Yes/No)	Yes
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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

The State Plan must include

Include

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 No 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)

3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No) No

3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan No

3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act

3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act

3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act

3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as 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

The State Plan must include

Include

4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as No 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)

4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act

4.e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act

4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act

4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act

4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act

4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs

4.j. With respect to students with disabilities, the State,

4.j.i. Has developed and will implement,

4.j.i.I. Strategies to address the needs identified in the assessments; and

4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and

4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))

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

The State Plan must include

Include

individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act

5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act

6. Financial Administration of the Supported Employment Program:

6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act

6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the 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 Goals for the Core Programs

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

with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

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

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

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

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

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

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

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

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

- Credential Attainment Rate

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

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

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

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

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 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				
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult program, Dislocated Worker program, Youth program, Wagner-Peyster Act program, Adult Education and Family Literacy Act program, and the Vocational Rehabilitation program—and also submit relevant information for any of the eleven partner programs it elects to include in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that program. 24 If included, Combined State Plan partner programs are subject to the “common planning elements” in Sections II-IV of this document, where specified, as well as the program-specific requirements for that program.

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

PERFORMANCE INDICATOR APPENDIX

ALL WIOA CORE PROGRAMS

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

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

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

Metric	Strategies	Outcomes
Cultivate State and Local Collaboration	<ul style="list-style-type: none"> Develop a Combined State Plan Establish strong workforce development boards Meet/communicate regularly Actively engage staff/partners/board members; educate/update/solicit feedback from workforce development system Bring organizations and resources together to openly discuss problems and to evaluate potential solutions Develop workforce development system tool kit for staff/partners/board members Establish shared metrics/goals that are important to WV 	<ul style="list-style-type: none"> Eliminate service duplication Get state agencies and partners on the same page Engage workforce development board members Create a sense of accountability Improve partner relationships; promote unity Serve WV better Maximize Federal and State dollars Understand rules/language/operational procedures Exhibit transparency/remove silos/promote alignment Foster complementary relationships/not competing
Reinforce Effective Policies/Processes	<ul style="list-style-type: none"> Ensure alignment with State Plan vision, goals, and strategies. Create/modify/rescind as appropriate. Identify similarities/differences, requirements/options, cause/effect, pros/cons, etc. to determine functionality and relevance moving forward Structure in measurable, documented ways to enforce requirements, monitor compliance, make certain terms are met 	<ul style="list-style-type: none"> Eliminate duplication and streamline approaches Drive accountability Remove unnecessary barriers/improve accessibility Communicate expectations and establish quality controls Demonstrate compliance with Federal and State law/code/regulations, etc.
Expand Cross-Training	<ul style="list-style-type: none"> Contribute to partner information documents and websites; develop cross-training resources/handbooks Create workgroups to study current system aspects Expand Jobs and Hope WV case management services Train case managers/career planners to be familiar with all Federal and State programs and funding sources 	<ul style="list-style-type: none"> Case managers/career planners make necessary referrals to partners and services for support Gets state agencies and staff on the same page Make it easier for citizens to be successful
Maximize Federal and State Dollars	<ul style="list-style-type: none"> Develop workforce development system tool kit for staff, partners, employers, individuals Pay for expansion of case management through the SUD Medicaid Waiver Develop workgroup of agencies to assess duplicative expenditures Conduct and examine asset mapping/real estate review 	<ul style="list-style-type: none"> Eliminates duplication Demonstrate budgetary efficiency Allow Federal and State dollars shift where needed Identify unnecessary expenses

Metric	Strategies	Outcomes
Make data-driven decisions	<ul style="list-style-type: none"> Identify shared data which can be measured across state agencies Establish data-collect timely and accurately Analyze data to determine necessary improvements/initiatives Survey employers, individuals, partners in meaningful and value-added approaches 	<ul style="list-style-type: none"> Agencies make reliable decisions Demonstrate capability to inform and forecast workforce development system needs Solve problems; inform/plan employment and networking focus, and future initiatives
Strengthen Partnerships	<ul style="list-style-type: none"> Facilitate open and honest discussions; identify what hasn't worked and produce solutions to improve upon the workforce development system Provide greater customer service at all levels by engaging employers, employment/training providers, community organizations, State agencies, and partners to design services that meet the needs of employers and job seekers Help organize service offerings and provide necessary support 	<ul style="list-style-type: none"> Engage members on state and local workforce development boards Meet the needs of employers Prepare individuals to be successful Demonstrate reliability and fosters continued collaboration and engagement Make a positive impact/improve performance/bring employers back
Survey and Establish Common Intakes/Locations	<ul style="list-style-type: none"> Identify shared allowable data for common intake/portal; promote a 'no wrong door' approach Identify intakes/assessments that are universally acceptable Evaluate current agency/service location activities/demographics/modes of interaction Define data elements/track activity to be responsive to economic changes 	<ul style="list-style-type: none"> Make it easier to serve citizens Maximize Federal and State dollars Provide services/activities where needed most Integrate approaches Streamline workforce development system Design wrap around services/career counseling support
Promote Strategic Communication and Outreach	<ul style="list-style-type: none"> Communicate constructively and regularly Utilize data to determine marginalized populations Identify and assess major workforce gaps that will impede successfully implementing the state's economic development strategies Create incentives for employers to engage with WV's workforce development system Research and network with other States and organizations to adopt best practices Highlight workforce development system benefits-get noticed 	<ul style="list-style-type: none"> Reputation-become the 'go to' system for workforce supply/demand; become a model for innovation Ensure inclusion and equity Make the state more competitive in attracting new business; recruit/engage employers Provide the workforce development system the opportunity to learn and respond to WV's immediate and future economic needs Maintain a mode of proactivity Connect job seekers/employers to opportunities
Serve WV Better	<ul style="list-style-type: none"> Specify short- and long-term goals and metrics for evaluation purposes Discover what it takes to engage/support individuals in their education/employment goals and implement accordingly Provide realistic, innovative, and effective guidance and case management Promote human-centered approaches and build a system that succeeds 	<ul style="list-style-type: none"> Assess system effectiveness/performance Increase labor force participation rate Self-sufficiency and sustainability Economic development Prepare an educated and skilled workforce

OTHER APPENDICES