Workforce Innovation and Opportunity Act

Unified State Plan

North Carolina

2020

Table of Contents

I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY 5

(a) Unified or Combined State Plan 5

(b) Plan Introduction or Executive Summary 5

II. STRATEGIC ELEMENTS 7

(a) Economic Analysis 7

(b) State Strategic Vision and Goals 25

(c) State Strategy 33

(d) Strategies to Align Core Programs 36

III. OPERATIONAL PLANNING ELEMENTS 40

(a) State Strategy Implementation 40

(b) State Operating Systems and Policies 73

IV. COORDINATION WITH STATE PLAN PROGRAMS 98

V. COMMON ASSURANCES 99

VI. PROGRAM-SPECIFIC REQUIREMENTS: ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES UNDER TITLE I-B 101

(a) General Requirements 101

(b) Adult and Dislocated Worker Program Requirements 109

(c) Youth Program Requirements 117

(d) Single-area State requirements 124

(e) Waiver Requests (optional) 125

(f) Title I-B Assurances 129

VII. PROGRAM SPECIFIC REQUIREMENTS: WAGNER-PEYSER ACT PROGRAM 131

(a) Employment Service Professional Staff Development. 131

(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. 133

(c) Describe the State's strategy for providing reemployment assistance to UI claimants and other unemployed individuals. 134

(d) Describe how the State will use W-P funds to support UI claimants, and the communication between W-P and UI 134

(e) Wagner-Peyser Assurances 143

VIII. ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM 145

(a) Aligning of Content Standards. 145

(b) Local Activities. 146

(c) Corrections Education and other Education of Institutionalized Individuals. 149

(d) Integrated English Literacy and Civics Education Program. 150

(e) State Leadership. 153

IX. PROGRAM SPECIFIC REQUIREMENTS: VOCATIONAL REHABILITATION BLIND PROGRAM 161

(a) Input of State Rehabilitation Council 161

(b) Request for Waiver of Statewideness 163

(c) Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System 163

(d) Coordination with Education Officials 165

(e) Cooperative Agreements with Private Nonprofit Organizations 174

(f) Arrangements and Cooperative Agreements for the Provision of Supported Employment Services. 176

(g) Coordination with Employers 176

(h) Interagency Cooperation 177

(i) Comprehensive System of Personnel Development 178

(j) Statewide Assessment 187

(k) Annual Estimates 194

(l) State Goals and Priorities 195

(m) Order of Selection 196

(n) Goals and Plans for Distribution of title VI Funds 197

(o) State's Strategies 198

(p) Evaluation and Reports of Progress: VR and Supported Employment Goals 203

(q) Quality, Scope, and Extent of Supported Employment Services 209

X. PROGRAM SPECIFIC REQUIREMENTS: VOCATIONAL REHABILITATION – GENERAL PROGRAM 210

(a) Input of the State Rehabilitation Council (SRC) 210

(b) Request for Waiver of Statewideness. 212

(c) Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System. 213

(d) Coordination with Education Officials. 217

(e) Cooperative agreements with private nonprofit organizations 231
(f) Arrangements and cooperative agreements for the provision of supported employment services 232
(g) Coordination with Employers: General Overview 236
(h) Interagency cooperation 238
(i) Comprehensive system of personnel development 239
(j) Statewide assessment 251
(k) Annual estimates 259
(l) State goals and priorities 259
(m) Order of selection 260
(n) Goals and plans for distribution of Title VI funds. 261
(o) State's strategies 262
(p) Evaluation and reports of progress: VR and supported employment goals 269
(q) Quality, scope, and extent of supported employment services 275
(r) Vocational Rehabilitation Certifications and Assurances 276

I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

(a) Unified or Combined State Plan

North Carolina has elected to develop a Unified State Plan that outlines a four-year strategy for the Workforce Innovation and Opportunity Act (WIOA) core programs:

Title I: Adult, Dislocated Worker, Youth

Title II: Adult Education and Family Literacy Act Program

Title III: Wagner-Peyser Act Program

Title IV: Vocational Rehabilitation Program

(b) Plan Introduction or Executive Summary

North Carolina's Unified State Plan is comprised of both strategic and operational planning elements. Strategic planning elements include analyses of North Carolina's economic conditions, workforce characteristics, and workforce development activities. These analyses lay the groundwork for the state's workforce development system's vision and goals and provide a framework for the delivery of workforce development programs and services that assist North Carolina's citizens and businesses with achieving economic prosperity.

Operational planning elements identify efforts that support the State's Workforce Development strategic vision and goals. The operational planning sections provide descriptions of the state's infrastructure, policies, and activities that are in place to help deliver workforce services to individuals and businesses and help the state's workforce development system to achieve its strategic goals.

Introduction

North Carolina Governor Roy Cooper's mission is to ensure North Carolinians are better educated, healthier, and have more money in their pockets so that they can live more abundant, purposeful lives. The cornerstone to achieving this goal is to help people get good-paying jobs to support themselves and their families. Through NC Job Ready, Governor Cooper's workforce development initiative, North Carolina is working to build a stronger and better workforce. NC Job Ready is built on three core principles: education and skills attainment are the foundation to a strong and resilient workforce; an employer-led workforce development system is key to the growth of a highly skilled and job ready workforce; and local innovation is critical to a dynamic and effective workforce system.

Through targeted investments and strategies in workforce development and job training, NC Job Ready is helping people obtain good-paying jobs that support themselves and their families. North Carolina's workforce development system is helping to implement NC Job Ready by connecting workers with career services and job training and helping employers by providing a pipeline of skilled workers they need to grow and succeed.

North Carolina's State Workforce Development Board, the NCWorks Commission, developed and adopted a new strategic plan in May of 2019 and incorporated the Governor's vision into its strategic planning process. The plan was developed with interagency input from partners at the state and local level and sets forth a vision and strategic goals for North Carolina's workforce development system, providing a framework for the delivery of workforce development services in North Carolina. The plan focuses on the coordination and alignment of the state's workforce programs and provided the foundation for the development of North Carolina's Workforce Innovation and Opportunity Act State Unified Plan.

Through its strategic planning efforts, the NCWorks Commission developed a vision and mission for North Carolina's Workforce System. This vision is to build a job-ready workforce to strengthen North Carolina companies, attract new businesses, and ensure our state can adapt to a changing economy. The mission of

the state's workforce development system, is to ensure North Carolina has an innovative, relevant, effective, and efficient workforce development system that develops adaptable, work-ready, skilled talent to meet the current and future needs of workers and businesses to achieve and sustain economic prosperity, and to ensure North Carolinians are ready for the jobs of today and tomorrow by increasing access to education and skills training, fostering employer leadership to prepare workers, and supporting and scaling local innovation.

The state's workforce development system is comprised of partners at the state and local level and is collectively referred to as the NCWorks system. The North Carolina Unified State Workforce Innovation and Opportunity Act Plan provides a description of the state's strategy and operational elements for the delivery of workforce development programs and services through its NCWorks system.

II. STRATEGIC ELEMENTS

(a) Economic Analysis

North Carolina is defined by an expansive geography that covers over 53,000 square miles and spans from the mountains in the west, to the piedmont region in the state's center to the coastal plain region in the east. This expansive geography contributes to the state's diverse mix of rural communities, small towns, cities, metropolitan areas and regional economic centers, each with its own unique industrial composition. Part of North Carolina's economic development strategy includes organization of the state's 100 counties into eight multi-county regions called Prosperity Zones, which are intended to help ensure economic growth across all areas of the state, by leveraging regional economic, workforce and educational resources. Overlaying the eight prosperity zones are North Carolina's 23 Local Workforce Development Board areas that help facilitate the delivery of workforce services to the state's citizens and employers.

Existing Demand Industry Sectors and Occupations.

As the state's leader for economic development, Governor Roy Cooper has charged the North Carolina Department of Commerce with targeting the following industries for recruitment, expansion of existing business, and the development of new companies: Aerospace Manufacturing, Automotive Manufacturing, Information Technology, Life Sciences/Biotechnology, Clean Energy, Food and Beverage Processing, as well as Defense-related and Tourism-related industries. Since 2014, The Department of Commerce has contracted with a public-private partnership called the Economic Development Partnership of North Carolina to carry out many of these activities. The Department of Commerce is currently engaged in the strategic planning process to develop a new comprehensive economic development plan to be released in April 2020. The plan is intended to guide the state's economic development strategies over the next four years and will be updated on an annual basis to reflect changing economic conditions.

While a new economic development plan is under development, assessment of the state's industry and occupational demand can be accomplished through a variety of informational resources including current employment trends, industry and occupational projections, "real time" job postings information and feedback from the state's employers. Since the beginning of Governor Cooper's term in January 2017, North Carolina has added approximately 205,000 net jobs (as of October 2019) including 198,800 private sector jobs. The state's rate of total job growth (4.7%) has exceeded that of the nation (4.3%) with North Carolina's rate of private sector job growth outpacing the U.S. (5.4% vs. 4.8%).

The total net job growth has been driven by 185,100 jobs in the state's service providing industries and 19,700 jobs in the state's goods producing industries. Within the state's service providing industries, the Leisure and Hospitality Services sector has experienced the growth of 42,300 jobs at an 8.7% growth rate since January of 2017. In addition, the Trade, Transportation and Utilities sector has experienced the growth of 39,300 jobs (4.8%), while Professional and Business services industries added 33,900 jobs (5.5%), Educational and Health Services industries contributed 31,500 jobs (5.3%) and Financial Services industries added 21,400 (9.3%). Growth in North Carolina's goods producing industries has been dominated by the increase of 14,100 (6.9%) jobs in the Construction industries, while employment in the state's Manufacturing industries grew by 5,700 net jobs since January 2017.

North Carolina's current industry mix is concentrated in four industry super-sectors: Trade, Transportation and Utilities (859,000 jobs, 18.7% of total jobs); Government (734,500, 16.0%); Professional and Business Services (649,400, 14.2%) and Education and Health Services (626,100, 13.6%). These four sectors combined account for more than 58% of total jobs in the state and 72% of overall job growth since January 2017.

Dispersed across the state's industry sectors are a diverse set of occupations which help to fuel the state's economic diversity. North Carolina's occupational employment is concentrated across seven major occupational groups: Office and Administrative Support Occupations account for 14.4% of total jobs in the

state, followed by Sales and Related Occupations (10.8%); Food Preparation and Serving Related Occupations (9.7%); Production Occupations (7.8%); Transportation and Material Moving Occupations (7.4%); Healthcare Practitioners and Technical Occupations and Education, Training and Library Occupations (6.3%). These major occupational groups represent almost two-thirds (63%) of total jobs in the state.

Emerging Demand Industry Sectors and Occupations.

Industry Projections

While assessment of the current industry and occupational trends provides some indication of the state's economic conditions, additional information regarding industry and occupational projections are needed to help guide the efforts of North Carolina's workforce development system. North Carolina's Labor and Economic Analysis Division produces both Occupational and Industry Employment Projections. Long-term projections are based on a 10-year period and are available at the statewide level and at 16 prosperity zone sub-regions. Each prosperity zone sub-region is comprised of multiple counties which helps to emphasize major regional labor markets within each of the prosperity zones.

Based on the latest industry projections, North Carolina's industry employment is expected to reach over 5.0 million jobs by 2026, a projected growth of about 390,000 jobs compared to the state's 2017 employment level (4.7 million). Over two-thirds (67%) of all projected net job growth will be concentrated in six major industry sectors: Health Care and Social Assistance; Accommodation and Food Services; Professional, Science & Technical Services; Administrative & Support & Waste Management & Remediation; Retail Trade; and Construction.

By 2026, Health Care and Social Assistance industries are expected to add 93,000 jobs. The sector will account for nearly one quarter of the state's total net job growth. Changes in Health Care policies, the state's aging population as well as technological advances are expected to continue to spur employment growth in this sector.

In addition to the growth in the state's Health Care and Social Assistance industry, North Carolina's Accommodation and Food Services; Professional, Science & Technical Services; Administrative & Support & Waste Management & Remediation; Retail Trade; and Construction industry sectors are projected to add over 20,000 jobs each and when combined will account for 43% of the total job growth.

While most of North Carolina's major industry groups are expected to gain jobs, Manufacturing and Mining are projected to experience employment declines, with employment in the state's Agriculture and Utilities industries projected to remain relatively flat. Over the last several decades, job losses in North Carolina's Manufacturing industry have been well documented and this trend is expected to continue into the future. By 2026, employment in the state's Manufacturing sector is projected to be 10,000 jobs lower than its 2017 employment levels and its share of statewide total employment will continue to decline. However, manufacturing is still a large component of North Carolina's economy and is expected to account for over 450,000 jobs by 2026.

The state's overall projected employment expansion of almost 390,000 jobs corresponds to an 8.3% growth rate, however, not all regions of the state are expected to grow at the same rate. Among the 16-prosperity zone sub-regions, Wilmington is expected to experience the largest job growth (14.4%), followed by Charlotte (11.1%), Raleigh-Durham (9.0%), and Asheville (8.7%). The Rocky Mount-Wilson region is expected to experience the smallest job growth at 0.1%. Additionally, both the Charlotte and Raleigh-Durham regions will continue to lead the state in total employment and net job growth.

While total projected job growth provides a measure of the relative strength of the regional economies, changes in the underlying industry sectors will continue to drive the economic diversification within each of the prosperity zones and prosperity zone sub-regions. For example, service-providing industries are projected to gain jobs across each region while goods-producing industries are expected to decline in 9 out

of the 16-prosperity zone sub-regions, largely due to declines in manufacturing. The largest declines in goods-producing employment are expected to occur in Greensboro (-1,880 jobs), Hickory (-1,629), and Raleigh-Durham (-1,101). Of the 7 areas that are anticipated to add goods-producing jobs, the largest gains will be in the Southeast region including the following prosperity zone sub-regions: Goldsboro-Kinston (646), Wilmington (556), and Jacksonville-New Bern (435).

Underlying the changes in both the goods-producing and service-providing industries are several industries driving the anticipated growth. While several areas will experience overall declines within goods-producing industries, some will experience job gains fueled by growth in the Construction industries with the largest growth rates projected in the Charlotte (24%), Pinehurst-Rockingham (16.8%), and Wilmington (16.2%) areas.

Within the service-providing industries, some regions will experience growth in Administrative Support and Waste Management and Remediation Services, including the Asheville (28.5%), Wilmington (21.6%), Greensboro (20.9%), Raleigh-Durham (18.3%) and Fayetteville-Lumberton (15.6) and Hickory (12.6%) areas. Growth in Health Care and Social Assistance will be seen in the Wilmington (18.6%), Raleigh-Durham (16.9%), Asheville (14.2%), Pinehurst-Rockingham (13.6%) and Charlotte (13.2%) areas. Arts, Entertainment and Recreation industries will experience significant growth in the Charlotte (27.5%) Waynesville-Franklin (23.5%), and Wilmington (15.6%), Raleigh-Durham (14.6%), and Boone-Wilkesboro (13.3%) areas. The large employment growth in the Accommodation and Food Services industries is projected in the Wilmington (16.1), Waynesville-Franklin (14.7%), Jacksonville (14.4%), Greenville (13.5%) and Asheville (12.3%) areas.

Occupational Projections

While a diverse set of industry sectors are expected to contribute to both state and regional economic transformation, demand for workers will also be driven by projected growth among various occupations. Over 60% of the net job growth is expected to come from eight broad occupational groups: Food Preparation and Serving Related Occupations; Healthcare Practitioners and Technical Occupations; Sales and Related Occupations; Healthcare Support Occupations; Business and Financial Operations; Management Occupations; Personal Care and Service Occupations; and Computer and Mathematical Occupations. While growth will be spread across several major occupational groups, two occupational groups (Production as well as Farming, Forestry and Fishing) are projected to experience overall job declines.

In addition to job demands that stem from employment growth, North Carolina will experience demand for workers due to worker separations from individuals exiting the labor force as well as individuals transferring to different occupations. These worker separations are driven by several factors including employee turnover, job successions, and worker retirements due to an aging workforce. Several of the state's major occupational groups are projected to experience demand for workers due to both job growth and separation needs. These occupational groups include Food Preparation and Serving Related Occupations; Office and Administrative Support Occupations; and Sales and Related Occupations - each yielding a projected job opening above 650,000 from 2017 to 2026. Furthermore, while overall employment in Production Occupations is expected to decline, the state will continue to experience demands for production workers due to separations. Production occupations are projected to experience over 340,000 openings between 2017 and 2026.

Across the 16 prosperity sub-zone regions, several occupational groups will experience growth in employment. While Food Preparation and Serving Related Occupations are projected to have the highest net new jobs and openings across all the regions, Healthcare Support Occupations, Computer and Mathematical Occupations, as well as Personal Care and Service Occupations are projected to be the fastest growing occupational groups in all areas. Food Preparation and Serving Related Occupations are projected to grow approximately 350 jobs in the Elizabeth City area to more than 15,000 in the Charlotte area by

2026, and over 10,000 openings in the Pinehurst-Rockingham area and almost 187,000 in the Charlotte area. Growth in Healthcare Support Occupations across the state will range from a low of 3.3% in the Goldsboro-Kinston area to 22.1% in Wilmington. Growth in the Computer and Mathematical Occupations are expected to range from 4.3% in Greensboro to 23.4% in Wilmington. Meanwhile, growth in Personal Care and Service Occupations are projected to expand from 2.3% in Rocky Mount-Wilson to 18.1% in Charlotte.

Employers' Employment Needs.

Employer Needs Survey

North Carolina's workforce development system is committed to providing the state's employers with a highly skilled workforce. Part of this commitment includes working with employers to continually assess their workforce needs. As part of this effort, North Carolina's workforce partners have implemented a biennial Employer Needs Survey. The first survey was implemented in 2014 with additional surveys and reports completed in 2016 and 2018; a new survey is currently in the data collection phase, with an anticipated publication date of mid-2020. The current survey is designed to gauge employer's hiring plans, recruitment strategies, hiring experiences and workforce challenges.

Results from the 2018 survey revealed employers were experiencing hiring difficulties, with half of all responding employers reporting difficulty in filling at least one position within the previous 12 months, up from 4 out of 10 employers experiencing similar difficulties in 2016. Manufacturing and STEM employers reported higher levels of difficulty, with nearly 6 in 10 employers reporting hiring difficulties. Employers in the two largest labor markets in the state, Charlotte and the Triangle, reported lower levels of hiring difficulty, while employers in the medium-sized metropolitan areas reported more difficulty.

When asked about reasons for hiring difficulties, the most frequently selected explanations were a lack of basic employability skills (such as a lack of work ethic) among jobseekers as well as low numbers of applicants. A lack of work experience, technical skills, soft skills, and education were also frequently reported by employers which is in line with findings from the 2016 and 2014 surveys.

More than three-quarters of employers who responded to the survey were seeking to fill entry-level positions and they reported more difficulty filling these entry-level positions, suggesting a potential target area for workforce development efforts. In addition, basic employability skill needs including work ethic, motivation, punctuality, and other characteristics were identified as important to employers in their hiring and retention decisions. Many of these skills can be acquired through early work-based learning experiences. The declining prevalence of youth employment may also contribute to a lack of exposure to work environments, and programs which teach on-the-job learning such as registered apprenticeships may be a tool to address these needs.

Survey results also identified opportunities for increasing employer awareness and utilization of workforce development resources. While some employers report using the workforce development system to respond to challenges (particularly the North Carolina Community Colleges and NCWorks Online), there are more that are not taking advantage of North Carolina's Workforce System and are unaware of the existing resources available to them, particularly in the state's rural areas and among Manufacturing and STEM employers. Finally, the increased level of difficulty in the medium-sized metropolitan areas suggests these employers may need additional outreach resources from the workforce development system.

Online Job Postings

Occupational and Industry projections provide a critical component for assessing North Carolina's job demand landscape; however, they do not provide a robust measure for assessing "current" demand for workers. Information for current demand can be obtained through analyses of online job postings. Based on information available through the Conference Board's Help Wanted Online series, online advertised vacancies in North Carolina averaged 205,000 over the most recent 12-month period. The occupational

group with the largest number of job openings was Office and Administrative Support Occupations (29,000), followed by Food Preparation and Serving Related Occupations (25,000) and Sales and Related Occupations (24,000). The Southwest region of the state had the most job openings (68,000), followed by the North Central region (59,000) and the Piedmont-Triad region (30,000).

North Carolina is currently experiencing a tight labor market, with relatively few jobseekers per job opening. The state had an average of 1.8 jobseekers per job opening during the most recent 12-month period, down from 11.3 jobseekers per job opening during the peak of the recession. The tightness in the labor market is occurring across all regions and all occupational groups.

Despite a tight labor market statewide, labor market tightness has shown some regional and occupational variation, indicating some level of geographic or occupational "mismatch" between the needs of employers and jobseeker attributes. The number of jobseekers per job opening by region ranged from a low of 1.3 in the Southwest region to a high of 3.0 in the Northeast and Southeast regions. The number of jobseekers per job opening by occupation group ranged from a low of 1.5 for "knowledge jobs" that are nonroutine and utilize higher cognitive skills to a high of 1.9 for "blue-collar jobs" which are more routine and require higher manual skills.

(B) Workforce Analysis

While assessment of North Carolina's employment demand provides critical information regarding the state's current and future economic conditions, analyses of the state's population trends and labor force statistics reveal additional economic and workforce insights. North Carolina's population has been expanding with an overall growth rate of 8% between 2013 and 2018. In 2015 North Carolina become the 9th most populated state surpassing Michigan. In 2018, net migration accounted for more than three of every four new residents to the state, while natural growth declined to the lowest level since 1970. While the state has continued to experience population increase, this growth has not been equivalent across all areas of the state. Mecklenburg and Wake Counties, the two largest counties, accounted for 33% of the state's net 2018 population increase, and the two counties making up the Charlotte, Raleigh, and Durham Metropolitan Statistical Areas (MSAs) accounted for 63% of the state's total growth. In addition, several areas are experiencing population shifts due to growth of aging population and decline of youth and other younger age groups. According to the latest U.S. Census estimates, 28 counties lost population from 2017 to 2018, and 43 counties have lost population since 2010. In 2018, about 16% of North Carolina's total population was 65 or older and is projected to go up to 19% by 2028. However, several regions within the state have already experienced this demographic shift.

(i) Employment and Unemployment

While North Carolina has been experiencing demographic shifts in its population, the state's labor force has been experiencing changes as a result of the state's improving economy. During the most recent 12-month period (November 2018 – October 2019), North Carolina's statewide unemployment rate averaged 4.0%, ranging from a high of 4.2% to a low of 3.7%. This is the lowest unemployment rate the state has experienced since the 1990s. Over the last year North Carolina has continued to experience growth in its labor force expanding from over 4.9 million in November 2018 to over 5.1 million in October 2019. Labor force estimates include the number of individuals who are working as well as those who are unemployed. As of October 2019, there were 4,924,454 persons employed in the state and 204,151 unemployed workers with a seasonally adjusted unemployment rate of 4.0%.

While the state has been experiencing growth in its labor force over the last several years, the state's labor force participation rate has been experiencing a decline, falling from an average of 67.7% in 2000 to an average of 61.2% in 2018. Nearly two-thirds of this decline is attributable to an aging population. However, over the last several months the state's overall labor force participation rate has been rising and reached 61.9% in September and October of 2019.

Despite the low statewide unemployment rate, labor market conditions have varied by region in the state. The Western region has experienced the lowest average unemployment rate at 3.6%, while the Sandhills region had the highest average rate at 5.1%.

In addition to geographical differences in labor force statistics, there are marked differences across the state in unemployment rates for several demographic groups. Over the last year, the unemployment rate for youth (age 16-24) was 7.3%, compared to 3.0% for adult workers (age 25-54). Black and Hispanic workers had unemployment rates of 5.5% and 4.7%, respectively, while the unemployment rate for non-Hispanic whites was 2.8%.

North Carolina's labor force statistics also reveal significant variations with respect to several sub-populations, including individuals with disabilities as well as the veterans. According to the U.S. Census Bureau, in 2018 approximately 15.5% of North Carolina's population aged 16 years and over (or nearly 1.3 million individuals) was characterized as having some sort of disability. Of these individuals, only 23.0% were employed, and 74.4% were not in the labor force. Among individuals aged 20 to 64 with a disability, the unemployment rate was 10.7%. North Carolina had approximately 667,000 veterans living in the state in 2018, with an unemployment rate of 3.3% and a labor force participation rate of 76.0% for veterans aged 18 to 64.

While North Carolina's economy has been experiencing a period of job growth and low unemployment, portions of the state's labor force continue to be impacted by job losses. Over the 12-month period from July 2018 to June 2019, the state's unemployment insurance system processed over 171,000 initial claims for unemployment insurance benefits for over 170,000 individuals. This number of initial claims was down 19,000 from the previous program year. The population of claimants were 53% female and 47% male while 47.5% were white and 41.0% black. In terms of age distribution 42.2% of claimants were between the ages of 25 and 40, and 47.2% between the ages of 41 and 65 with 8.1% less than 25 years of age. The claimant population included about 15,500 veteran service members or eligible persons. With respective educational attainment 40.2% had a high school diploma or less, 39.5% had some college, 10.6% had an associate degree, and 5.3% had a bachelor's degree or higher.

(ii) Labor Market Trends

Industry Trends

As previously noted above, the state has added 194,000 jobs since January 2017 including 179,000 jobs in the service-providing industries and 15,000 jobs in the goods-producing industries. Job growth has been driven by the addition of 41,000 jobs in the Trade, Transportation and Utilities industries, 36,600 in Professional and Business services industries, 32,200 in the Educational and Health Services industries; 31,900 in Leisure and Hospitality Services industries, and 18,100 in the Financial Services industries. Within the state's goods-producing industries, the Construction sector has added 14,800 jobs, while employment in the state's Manufacturing industries has remained stable, adding only 300 jobs since January 2017.

North Carolina's current industry mix is concentrated in four industry super-sectors: Trade, Transportation and Utilities (860,700 jobs, 18.8%); Government (736,300, 16.1%); Professional and Business Services (652,100, 14.2%); and Education and Health Services (626,800, 11.6%). Combined these four sectors account for nearly 63% of all jobs in the state and over 60% of all job growth since January 2017.

While information regarding statewide employment patterns provides an overview of the relative strength of the state's economy, more localized industry patterns can reveal regional and local strengths and opportunities. Information from the Bureau of Labor Statistics Quarterly Census of Employment and Wage program provides a more refined view of local employment trends.

Based on the annual average information for 2018, North Carolina had over 277,000 business establishments that paid $224 billion in wages to the state's workers. Employment within each of the eight

prosperity zones ranged from over 1.1 million in both of the North Central and Southwest zones to below 200,000 in the Northeast prosperity zone. Three of the zones, North Central, Southwest, and Piedmont-Triad, accounted for two-thirds of the state's total employment, 61% of overall establishments, and 71% of all wages paid. Not surprisingly these three regions are home to several of the state's large metropolitan statistical areas (MSAs) which include the Charlotte/Concord/Gastonia in the Southwest zone; the Burlington, Greensboro-High Point, and Winston Salem MSAs in the Piedmont Triad zone; and Raleigh, Durham-Chapel Hill, and Rocky Mount MSAs in the North Central zone.

In addition, these three regions had the highest average weekly wage of $1,112 in the Southwest, $1,091 in the North Central, and $879 in the Piedmont-Triad. The four prosperity zones with the smallest employment included the Northeast, Northwest, Western, and Sandhills and together these areas account for less than a quarter of the state's total employment and employing establishments. These regions account for only 17% of the state's total wages and their 2018 average weekly wages were less than 80% of the state's average wage. While there are significant geographic and economic differences across the eight prosperity zones, employment in each region is dominated by six major industry groups: Health Care and Social Assistance; Educational Services; Retail Trade; Manufacturing, Accommodation and Food Services, and Administrative Support and Waste Management.

When compared to the state, three prosperity zone regions have higher concentrations of Manufacturing employment. These include Northwest (23.7%), Piedmont-Triad (14.3%), and Sandhills (12.7%). Five regions have higher concentrations of Health Care, including Sandhills (18.4%), Western (17.9%), Northeast (17.0%), Southeast (15.4%), and Piedmont-Triad (15.0%) while four regions have higher concentrations of Retail Trade - Southeast (14.9%), Western (13.7%), Northeast (13.4%), and Sandhills (12.8%). Employment in four of the prosperity zones have higher concentrations in Accommodation and Food Services - Western (12.8%), Southeast (12.5%), Northeast (11.8%), and Sandhills (10.5%) – this reflects their industry centers which support the tourism industries in their regions. Three regions have higher concentrations of Educational Services, including Northeast (11.9%), North Central (11.2%), and Sandhills (10.4%). Both the North Central and Southwest regions have higher employment concentrations in Professional, Scientific, and Technical Services (8.6%). These concentrations are attributable to the high-tech industries that are centered around the Charlotte MSA in the Southwest area and the Raleigh and Durham-Chapel Hill MSAs in the North Central region. Additionally, the Southwest region has higher concentrations of employment in the Finance and Insurance (6.3%) due to the Charlotte area as a regional center for the banking industry.

Occupational Trends

Just as North Carolina's industry mix reflects the states diverse economic base, the state's existing workforce is spread across a diverse group of occupations. Over 14% of the state's occupational mix is centered in Office and Administrative Support Occupations, 10.8% in Sales and Related Occupations, 7.8% in Production Occupations, 7.4% in Transportation and Material Moving Occupations. Over the next several years employment in Health Care Related Occupations is anticipated to continue to expand. Current employment levels reveal that 6.4% of all occupational employment is in Healthcare Practitioners and Technical Occupations and 3.4% in Healthcare Support Occupations. An additional 6.3% of the state's occupational employment is concentrated in Education, Training and Library occupations.

(iii) Education and Skill Levels of the Workforce

North Carolina possesses a world class system of higher education which is comprised of two public systems of higher education, the North Carolina Community College System (NCCCS) with 58 colleges and the University of North Carolina (UNC) System with 16 post-secondary institutions as well as more than 40 private institutions of higher education. While the combined efforts of these public and private institutions help produce a skilled workforce for the state, challenges still exist. In 2018, almost 12% of the population 25 years and over had less than a high school diploma, 25% had a high school diploma, 21% had some

college but no degree, 10% had an associate degree, and 20% had a bachelor's degree while 11% had a Graduate or professional degree as their highest level of educational attainment.

In addition to the educational attainment of the state's population, North Carolina faces challenges in addressing the education and training needs of those individuals with disabilities. Based on information from the U.S. Census Bureau's American Community Survey 1-year estimates, there are nearly 1.2 million individuals with a disability in North Carolina who are 25 years of age or older. Of these, 22% have less than a high school diploma, 32% are high school graduates, 30% have some college or associate degree, and 17% have a bachelor's degree or higher. When compared to the population 25 and older without a disability, only 9.5% of those without a disability have less than high school diploma, 24% are high school graduates, 31% have some college or associate degree, and 35% have a bachelor's degree or higher.

In 2018, approximately 9.2% of the state's population aged 25 years and over were veterans of military service. Veterans have a much lower rate of having less than a high school diploma than non-veterans (5% vs. 13%), a similar rate of high school degrees (25%), a higher rate of some college or Associate degrees (40% vs. 30%), and a slightly lower rate of bachelor's degrees or higher than non-veterans (29% vs. 32%).

(iv) Skill Gaps

While North Carolina's projected employment growth will be spread across a diverse group of industries and occupations, the state will be faced with ensuring that its workforce has the necessary education, training, and jobs skills to meet both industry and occupational demands.

In 2017, occupations requiring no formal education or only a high school diploma accounted for 62.7% of total employment; however, this is projected to decline to 62% by 2026. At the same time, the share of occupations requiring education beyond high school will increase. Jobs requiring some post-secondary training below a bachelor's degree will increase by 9.5% while those requiring a bachelor's degree for entry will grow by 11.5% and jobs requiring an advanced degree for entry are projected to grow the fastest at 12.4%. These growth rates are all higher than the increase in jobs requiring a high school diploma or less for entry (7.1%).

Based on the projected need for additional workers with postsecondary education and previous research by Georgetown University's Center on Education and the Workforce, the myFutureNC Commission was established in late 2017 as a statewide initiative to focus on educational attainment. The Commission brought together North Carolina's thought leaders in education, business, philanthropy, the faith-based and nonprofit communities, and ex officio representatives from the North Carolina House of Representatives, Senate, and Governor's office. The Commission's primary goal was to create a statewide education plan for early childhood through postsecondary education to recommend a clear attainment goal, identify key benchmarks for measuring progress toward that goal, and propose priority areas to guide the future of education in North Carolina.

On Feb. 20, 2019, myFutureNC unveiled its goal and bold vision for the future of education in North Carolina: to ensure that by 2030, 2 million North Carolinians, age 25-44, have a high-quality postsecondary degree or credential. In the summer of 2019, myFutureNC became a statewide nonprofit organization to carry on the work of the Commission. According to myFutureNC, as of 2016 about 1.3 million adults aged 25 to 44 in the state had a high-quality postsecondary degree or credential. Without any changes, North Carolina is projected to have about 1.6 million adults who meet the attainment definition in 2030, which means the state will need to produce an estimated 400,000 additional residents to attain a high-quality postsecondary credential or degree for our state to meet the demands of employers. The myFutureNC nonprofit will work to engage local, regional, and statewide stakeholders to communicate the need for both greater educational attainment and deeper economic alignment; to better align and coordinate systems to support students at all levels, from pre-K education through high-quality certificate, associate, and higher-degree programs; to be a catalyst for innovative, effective ideas and identifies best practices that can be

applied to cities, towns, and rural areas across North Carolina and to monitor progress to improve its efforts each and every year.

(2) Workforce Development, Education and Training Activities Analysis

(A) The State's Workforce Development Activities

Governor Cooper's mission is to ensure North Carolinians are better educated, healthier, and have more money in their pockets so that they can live more abundant, purposeful lives. The cornerstone to achieving this goal is to help people get good-paying jobs to support themselves and their families. Through NC Job Ready, Governor Cooper's workforce development initiative, North Carolina is working to build a stronger and better workforce. NC Job Ready is built on three core principles: education and skills attainment are the foundation to a strong and resilient workforce; an employer-led workforce development system is key to the growth of a highly skilled and job ready workforce; and local innovation is critical to a dynamic and effective workforce system.

Skills and Education Attainment

Education is the foundation of a strong workforce. But despite North Carolina's decades-long reputation for education excellence through its world-class community colleges, universities, and public schools, employers in North Carolina too often encounter challenges in finding workers with the right skills. As the skill requirements of jobs are increasing and rapidly changing, businesses need to find people with the right skills for the jobs they create, and North Carolinians need access to education and training to prepare for those jobs.

Recognizing that an educated North Carolina is a job-ready North Carolina, Governor Cooper established a goal to make North Carolina a Top Ten Educated State by 2025 by increasing the number of four-year-olds enrolled in high quality pre-K, raising the high school graduation rate, and increasing the number of North Carolinians with a post-secondary degree or credential. Governor Cooper has also been instrumental in the formation of the myFutureNC goal and the statewide nonprofit organization focused on educational attainment. As North Carolina's economy grows, most new jobs require education beyond a high school diploma—but fewer than half of North Carolinians ages 25-44 have a high-quality postsecondary degree or credential. The mission for myFutureNC is to close the educational attainment gap in North Carolina by helping 2 million North Carolinians ages 25-44 achieve high-quality postsecondary attainment by 2030. This goal will help address the needs of employers, equip local communities to take action, and open up new opportunities for North Carolinians. In June 2019, Governor Cooper signed House Bill 664 codifying the myFutureNC goal into state law.

In order to close the attainment gap, the state must make significant investments in ensuring North Carolinians have access to, and support in completing, postsecondary training. After hearing countless stories of college students working hard to better their lives but getting thrown off course by a financial emergency, Governor Cooper launched the Finish Line Grants program. Finish Line Grants help community college students who face unforeseen financial emergencies complete their training. Workforce Development Boards and community colleges partner together to distribute WIOA state set-aside funds to help students pay for course materials, housing, medical needs, car repairs, dependent care, or other financial emergencies that students may face through no fault of their own. To date, over 3,700 Finish Line Grants have been awarded to help students stay on course to complete their training. Where Workforce Development Boards and community colleges have already tracked retention rates for Finish Line Grant recipients, the results are impressive. For example, at Southwestern Community College, 97 percent of Finish Line Grant recipients are still enrolled or have completed their training —well above the college's overall 64 percent retention rate.

Governor Cooper also issued Executive Order No. 92, establishing North Carolina as an Employment First state to increase opportunities for fair wages, employment and careers for individuals with disabilities. This will also help meet the state's workforce needs by improving recruitment and retention of talented employees with disabilities, establishing state government as a leader in this area and encouraging private businesses to follow suit.

North Carolina also has a strong history of developing career pathways to help North Carolinians get the education and training they need. To date, communities in North Carolina have developed 36 Certified Career Pathways to help North Carolinians work in high-demand, high-wage careers, with additional pathways being developed. Finally, Governor Cooper has also proposed NC GROW (Getting Ready for Opportunities in the Workforce), a new scholarship and financial aid program to help people get community college degrees and training necessary to enter high-demand, high-wage jobs, in his budget proposal. NC GROW would help make North Carolina a Top 10 Educated state by 2025 and achieve the myFutureNC goal of 2 million North Carolinians with a postsecondary degree or credential by 2030.

Employer Leadership

Employers know best what skills their workers need, and business leadership is key for workforce development and job readiness. Businesses that invest in developing North Carolina's workforce will benefit from well-trained employees and a more innovative workplace that better reflects its community.

Recognizing that employers must be in the driver's seat of workforce development, Governor Cooper recently launched a Next Generation Sector Partnership initiative to promote a coordinated strategy among workforce, economic development, and education organizations to meet businesses' needs. Next Generation Sector partnerships are collaborations of businesses from the same industry and labor market that work with workforce partners to address workforce and other competitive needs of their industry. The model puts businesses at the center of this collaboration and allows government and organizations to listen and learn how to support businesses more successfully. Currently, three North Carolina regions are receiving technical assistance, coaching and support to launch Next Gen Sector Partnerships in the advanced manufacturing and biopharma industries.

Governor Cooper has also made significant investments in increasing work-based learning opportunities at employers across the state, recognizing its power to give students and jobseekers a taste of the technical skills associated with a given career, help them develop critical soft skills needed to be successful, and equip them with the tools to decide if they are on the right career path. That starts with employers getting involved in their local schools to increase students' career awareness and understanding of the jobs available now and in the future. Work-based learning also includes internships, pre-apprenticeships, youth apprenticeships and registered apprenticeships where students experience real-world professional environments and learn new skills specific to the job they hope to pursue.

In late 2018, Governor Cooper announced a free, first-of-its kind online tool to lead the way in connecting education to career. The new work-based learning tool, called the "Navigator," brings together members of business, education, and workforce development communities in a space where they can post, search for and measure work-based learning opportunities. To date, more than half of North Carolina's educators have logged in to the Navigator to find work-based learning opportunities for their students.

North Carolina was also recently named one of nine grant winners selected from more than 220 applicants to expand youth apprenticeships. Through the Partnership to Advance Youth Apprenticeships, the North Carolina Community College System Office, Governor's Office, North Carolina Business Committee for Education, Workforce Development Boards, and other workforce development advocacy groups will scale and expand youth apprenticeships into new industries such as financial services, agribusiness, and hospitality and tourism.

North Carolina was also one of six states selected by the National Governors Association to expand work-based learning opportunities. Through a partnership between the Governor's Office, Department of Commerce, North Carolina Business Committee for Education, Department of Public Instruction, and Workforce Development Boards, North Carolina hosted two state-wide summits focusing on expanding work-based learning in the state. Recently, North Carolina was selected for an ongoing cohort of states to continue this work and develop regional work-based learning cohorts. Governor Cooper has also proposed a Work-Based Learning Fund in his budget to help companies start or scale internships, apprenticeships, and other work-based learning activities.

Local Innovation

Communities across North Carolina are developing great local models of workforce development. North Carolina should build on those successes and replicate them in more places to continue building and expanding innovative solutions.

In 2018, Governor Cooper launched the "NCWorks Local Innovation Fund," a grant administered by the Department of Commerce Division of Workforce Solutions and the NCWorks Commission. The grant provides funding for local communities to pilot innovative programs or replicate successful program models that address a local or regional workforce issue; specifically targeting an underserved or under resourced community or population. Communities assembled collaborative teams to design and implement a set of solutions to a workforce issue. Teams include representatives from the local, regional and state level of workforce, education, community, labor and business leaders. Currently, six innovative projects are receiving support from the NCWorks Local Innovation Fund, including projects to train construction and repair workers to fix damage to the state from Hurricane Florence, provide postsecondary training to formerly incarcerated individuals, and expand an early childhood educator training program. Teams meet periodically to share progress and challenges in their projects, and the NCWorks system plans to collect and replicate best practices across the state.

NCWorks Supporting NC Job Ready

NCWorks, North Carolina's public workforce development system is a statewide partnership that helps people find new or better employment, and helps businesses connect with the talented workers they need. The NCWorks system is essential to the success of the NC Job Ready initiative.

The NCWorks system is comprised of an array of workforce and educational programs that serve a diverse population across various age groups. The NCWorks system provides workforce development activities that increase occupational skill attainment, employment, retention, and participant earnings. The state's workforce development services range from online self-service activities, to staff-assisted services in one of 83 NCWorks Career Centers, to multi-year training programs at high schools, community colleges and universities and vocational rehabilitation services to individuals with disabilities. Individuals may participate in a single program or activity or may be eligible to receive services through multiple programs and service providers. The system consists of programs and networks designed to help individuals succeed in the workplace by providing career services, skill development, training and employment services to workers and by helping businesses locate, hire and retain a skilled workforce.

The NCWorks system works closely with employers throughout the state, helping them find the right candidates and develop training programs that can improve the skills of their current workforce. Workforce development services for businesses include recruiting, assessing, screening, and candidate referral; work-based learning and customized training opportunities; assistive technology and other support for businesses that hire people with disabilities; and the provision of labor market information that helps connect employers to a steady pipeline of talented citizens who have the skills to help their businesses thrive.

Under North Carolina's general statutes, the NCWorks Commission is charged with reviewing and evaluating the state's publicly supported workforce development programs for effectiveness, duplication, fiscal accountability, and coordination. The NCWorks Commission completes an annual review of 19 workforce development program plans, policies and services across five agencies in North Carolina. This annual review includes an analysis of the WIOA core programs, as well as other one-stop delivery system partners. The commission reviews workforce program funding levels and sources, service provision types, special populations served and business outreach initiatives. Appendix 2B includes a summary of the workforce programs offered in North Carolina. North Carolina's 23 Local Workforce Development Boards (WDBs) and the NCWorks Commission are working together to collect performance data in three main areas, that include Outreach & Engagement, Skills Gap, and Process measures.

(B) The Strengths and Weaknesses of Workforce Development Activities

Strengths

North Carolina has a strong workforce development system that provides a diverse set of workforce programs and services to individuals and businesses with the goal of helping jobseekers and students obtain and maintain employment through career, training, education, and supportive services and helping businesses find qualified workers needed to be successful. The NCWorks system is a partnership of state and local workforce development partners that provide an array of services geared to assisting individuals with defining career pathways, skills assessment, work readiness, occupational skills training in high-demand occupations and industry sectors, work-based learning opportunities, employment search and job referral. NCWorks assists employers through a diverse set of business services including job recruitment, retention, layoff aversion, labor market information and training.

NCWorks is a unified workforce development system and an instrumental partner for ensuring North Carolina's economic future. The primary partners for career search and job placement assistance are the state's 23 Local Workforce Boards and the Department of Commerce's Division of Workforce Solutions (DWS). North Carolina's 23 Local Workforce Development Boards provide oversight, planning, and administration of NCWorks Career Centers. The Division of Workforce Solutions (DWS) is the state administrative entity for the Workforce Innovation and Opportunity Act (WIOA) Title I and Title III programs. DWS provides Wagner-Peyser, Veterans Services, and Trade Adjustment Assistance (TAA) staffing in career centers.

There are 83 certified NCWorks Career Centers throughout the state of North Carolina. Each career center has the following fundamental qualities:

- Locally-responsive and demand-driven;
- Governed by a Workforce Development Board comprised of private sector representatives, local elected officials, and WIOA core partners;
- Provide access to a full range of core employment-related services to help businesses find the skilled workers they need and help job seekers find satisfying careers.
- Services are delivered through integrated service delivery strategy.

North Carolina has a strong State Workforce Development Board, the NCWorks Commission. The Commission is led by a private sector chair, with 33 members including representatives from the business community, state workforce agency administrators, state education leaders, and community leaders. Members of the Commission are appointed by the Governor. The Commission oversees North Carolina's Workforce Development system and ensures that the system is coordinated and aligned to meet the needs of the state's citizens and businesses. The NCWorks Commission is charged under both state and federal law with the authority and responsibility for ensuring that the state's workforce programs are working efficiently, effectively and collaboratively in preparing the state's workforce and meeting the needs of

businesses. In May of 2019, the NCWorks Commission approved the biennial strategic plan with a shared mission and vision for the workforce development system:

To ensure North Carolina has an innovative, relevant, effective, and efficient workforce development system that develops adaptable, work-ready, skilled talent to meet the current and future needs of workers and businesses to achieve and sustain economic prosperity; and to ensure North Carolinians are ready for the jobs of today and tomorrow by increasing access to education and skills training, fostering employer leadership to prepare workers, and supporting and scaling local innovation. To build a job-ready workforce to strengthen North Carolina companies, attract new businesses, and ensure our state can adapt to a changing economy.

The four strategic goals of the 2019 NCWorks Commission's strategic plan align with Governor Cooper's vision for workforce development in North Carolina and a new statewide educational attainment goal. These strategic goals assimilate North Carolina's workforce system's current strengths and incorporate strategies for aligning services in a way that results in high quality workers trained for in-demand occupations.

The North Carolina Department of Commerce's Labor and Economic Analysis Division (LEAD) is a strong resource for the NCWorks system and its partners. LEAD is responsible for collection of data, research and analysis, publication of information and reports regarding the state's economy and labor market, career information, development and implementation of information delivery systems as well as the assessment and reporting on the effectiveness of North Carolina's education and workforce programs. Information produced by LEAD helps the NCWorks system and other stakeholders make informed decisions regarding business recruitment, education and workforce policies and career development, as well as provides insight and understanding of the state and local economies.

The State of North Carolina operates eight administrative regions known as Prosperity Zones that organize the state's 100 counties to provide a consistent regional structure for economic and workforce development activities. Each zone features one-stop, physical locations, providing citizens and businesses the ability to interact with representatives from multiple state agencies, as well as to encourage better collaboration between the agencies themselves. The state deploys subject matter experts in each zone, from transportation and environmental topics to workforce development, community planning and liaisons to existing businesses in the zones.

In 2013, North Carolina implemented an integrated service delivery model for its NCWorks Career Centers. This service delivery model focuses on enhancing customer service and is organized around the provision of services to customers, not discrete funding streams and programs offered in silos. In North Carolina, the WIOA Title I Adult and Dislocated Worker programs and the WIOA Title III Wagner-Peyser Employment Services program are the operational backbone of the NCWorks Career Centers. Career centers implementing the integrated service delivery model deploy integrated staffing and technology to generate an integrated customer pool and customer flow. Career Center staff is organized by function, not by program or agency affiliation (funding source), with the purpose of serving customers efficiently and effectively. Staff is organized by function and cross-trained so that all staff members have the capacity to serve all customers and is knowledgeable about all services the center offers. Integrated staffing is a team-based approach that results in streamlined and seamless service delivery.

Given the importance of increasing skills and raising the overall educational attainment in the state, the unified North Carolina Community College System is a critical asset to the NCWorks system, and all 58 community colleges have linkages with their Local Workforce Development Boards and Career Centers. All offer program(s) as Eligible Training Providers for Adults and Dislocated Workers. In addition, the NCCCS has administrative oversight for the state's registered apprenticeship programs, ApprenticeshipNC. A large proportion of the apprenticeships and pre-apprenticeships related instruction is delivered through the local Community Colleges. Community colleges that operate Adult Education/Literacy programs on behalf

of the state are well positioned to offer Integrated Education and Training, providing foundational skills while providing occupational skills. Most Workforce Development Boards have community college representation.

The NC Department of Health and Human Services (NC DHHS) contributes to the NCWorks system in many ways as well. In additional to sponsoring Title IV vocational rehabilitation services through the Division of Vocational Rehabilitation and the Division of Services for the Blind, NC DHHS provides the connection to its services made available through its Division of Social Services which administers North Carolina's TANF Employment and Training (NC Work First), SNAP Employment and Training (FNS E&T), Economic Opportunity/Community Service Block Grant (CSBG) funds for emergency services and other supports for the wellbeing and health of North Carolina's workforce, including services and strategic approaches to curtailing the significant stresses opioid and substance use places on families and workforce through the NC DHHS Opioid Action Plan that has demonstrated great success.

Additionally, the NC DHHS vocational rehabilitation program staff regularly contribute through the provision of regular reviews and consultations pertaining to site and program accessibility through its subject matter experts knowledgeable of career center program accessibility requirements and certification processes.

Nonprofit partners are also a critical part of the System. Goodwill Industries, nonprofit literacy councils, community action agencies, and other nonprofits also play a large role in workforce development in their communities. Community-based organizations including faith-based organizations, community action agencies, opportunities industrialization centers, and community development corporations are often well-positioned to reach and provide intensive specialized training and support services to underserved populations.

Weaknesses

North Carolina has a strong workforce development system which provides a breadth of workforce programs across several state and local entities, the state's workforce partners continue to work toward a workforce system that is fully integrated across all workforce agencies, programs and services. However, the state has identified several areas that need further strengthening. These include coordination of WIOA Title I and III programs with the WIOA Title II programs; integration of case management systems across workforce programs; updating of local Memoranda of Understanding; enhanced services to the state's businesses; and improved coordination and collaboration with state and local economic development activities.

A key priority for the system is the development of strategies that enhance the collaboration between the WIOA Title I and III programs with the state's Title II, Adult Education providers and Title IV Vocational Rehabilitation Services to offer skills training and academic preparation. However, the workforce system's complexity can be overwhelming to individuals and businesses seeking services. North Carolina will develop a plan to ensure better coordination across all WIOA core partners. This includes reviewing all Local Workforce Development Board representation to ensure including of Title II and Title IV providers. The goal is to develop an integrated system that does not duplicate services and provides access to all job seekers. Further integration of all core programs and services will ensure that the system is continually improving its customer focus.

In addition to continued work on integrating programs to ensure that all people are provided high quality service regardless of barriers, several areas have been identified for improvement. These include coordination of case management systems across partners, enhanced coordination of all core workforce programs, enhancement of business services, cross referral systems, enhanced alignment with economic development.

North Carolina's workforce programs support several independent case management/data collection systems. Consistent data sharing processes to address referral tracking, common intake, and service delivery would improve the system. In October of 2019, the North Carolina Department of Health and Human Services (NCDHHS) announced Geographic Solutions was awarded the contract for developing the case management system for the Title IV Vocational Rehabilitation Services programs for both DVRS and DSB. This has the potential of dramatically improving data integration, as Geographic Solutions is the current developer for the North Carolina Department of Commerce, Division of Workforce Solutions (DWS) NCWorks.gov case management system for WIOA Title I & III. The next phase is to include Title II integration so services can be tracked by all core partners. Additionally, the North Carolina SNAP Employment & Training Program (FNS E&T) has recently contracted with Geographic Solutions to build a module so their case management system (NC FAST) can actively communicate with NCWorks.gov. Both projects will certainly improve the integration of the state's case management systems and will help ensure customers have a more seamless experience in receiving services.

The Memorandum of Understanding process between the 23 local Workforce Boards core partners will be revised to ensure services and access to these services are clearly defined for all core partners. In addition, a review of the MOU timeline for submission will be reviewed to align with Title II grant submissions.

More feedback from businesses and individuals about their experience with the system is needed. This information will help the system and its individual programs understand what is working, and where improvements are most urgently needed. The North Carolina Department of Commerce, Division of Workforce Solutions (DWS) has contracted with the Eval-Group to create a customer feedback system to measure the quality of workforce services provided to businesses and job seekers throughout North Carolina.

Mapping cross-referral systems and the roles of different partners in different workforce areas could identify opportunities for enhancing existing partnerships across the System. Stronger policy alignment between the NCWorks Commission, and primary WIOA partner organizations is needed to ensure program continuity and aligned strategic vision across all four WIOA Titles.

A closer relationship with economic development organizations, at the local, regional and statewide level, is needed. This will help provide improved understanding of the current and future economy and will help NCWorks system prepare the workers that are needed for existing, new and expanding businesses in North Carolina. The Division of Workforce Solutions (DWS) has invigorated its business services team with the end goal of supporting increased performance and accountability for business services delivered by the 23 Local Workforce Development Boards and supporting better alignment between the 23 Local Workforce Development Boards and economic development throughout the state. This includes the provision of additional funding to the 23 Local Workforce Development Boards to support Business Engagement Coordinators who work to establish and facilitate relationships with local economic developers. DWS has purchased Customer Relationship Management (CRM) software for the 23 Local Workforce Development Boards to utilize, which will serve to assist them to more effectively deliver business services throughout the state. Finally, the NCWorks Commission has added a business engagement staff member to foster building relationships with economic development across the entire system. DWS is committed to providing resources to the 23 Local Workforce Development Boards which will enhance their delivery of business services throughout the state and foster their relationships with economic development.

Next Generation Sector Partnerships is a key area of focus for North Carolina to improve this collaboration. Driven by a partnership of key leaders from the Governor's Office, the North Carolina Community College System Office, the NC Department of Commerce, the Economic Development Partnership of North Carolina, the NCWorks Commission, and Local Workforce Development Boards, Next Gen Sector Partnerships support collaborative business engagement through industry-led sector partnerships. Next Generation Sector Partnerships are collaborations of businesses from the same industry and labor market that work

with education, workforce development, economic development and other community organizations to address workforce and other competitive needs of their industry. The "Next Gen" model puts businesses at the center of this collaboration and allows government and organizations to listen and learn how to support businesses more successfully. The partnership of state leaders provides technical assistance and coaching to selected partnerships throughout North Carolina.

The NCWorks Commission is focused on developing an innovative, relevant, effective, and efficient workforce development system. In addition, they are developing a roadmap for how the state workforce programs will achieve the goals and objectives that will address these limitations while creating a more customer-centric system that listens and responds to the needs of businesses to build employer-led job training programs that produce high quality career outcomes. Stronger alignment of policies between the Commission and core partners will help achieve these goals as well. This will help ensure that North Carolina's workforce development system continues to be successful in the current and future economy.

(C) State Workforce Development Capacity

North Carolina has a strong infrastructure and capacity to provide workforce development activities. The NCWorks Commission ensures coordination of, oversees, and assesses the performance of the state's workforce development programs including the WIOA core programs. In addition, the three state agencies responsible for the WIOA core programs are members of the WIOA State Steering Council.

The six WIOA core workforce programs are provided to job seekers and employers via NCWorks Career Centers (American Job Centers in North Carolina), online via the state's official job matching and labor exchange portal, NCWorks Online (NCWorks.gov), at local vocational rehabilitation offices, and at Title II program providers throughout the state. Below is an overview of the capacity of the three agencies.

North Carolina Department of Commerce, Division of Workforce Solutions

The North Carolina Department of Commerce's Division of Workforce Solutions (DWS) has administrative responsibility for WIOA Title I and Title III programs. Services are delivered through 83 local NCWorks Career Centers located within the state's 23 Local Workforce Development Boards. The local WDBs work to ensure the provision of high-quality workforce services to individuals and businesses across the state. Each of the local boards have representation from the Division of Workforce Solutions, local community colleges, and local vocational rehabilitation programs to ensure coordination and capacity building at the local and regional level.

The Division of Workforce Solutions has developed an integrated services delivery model which the 23 Local Workforce Development Boards have implemented at local NCWorks Career Centers to ensure an integrated and customer-focused approach to providing services to individuals and business.

North Carolina's 23 Local Workforce Development Boards provide operational oversight of the NCWorks Career Centers across the state. The NCWorks Commission develops and sets policies that guide the operation of the centers. All 83 NCWorks Career Centers, located throughout the state, provide Title I and Title III services. Staff at NCWorks Career Centers, Community Colleges, and Vocational Rehabilitation offices work collaboratively across entities to provide referral services across programs. Some career centers are co-located within community colleges, social services offices, or offices where vocational rehabilitation services are available. In addition, there are 25 affiliate locations where services are provided.

NCWorks Career Centers provide workforce development services and access to core partner services as well as access to other programs and activities carried out by one-stop partners identified in the WIOA. Basic services provided to job seekers and those seeking to upgrade their skills include:

- career assessment and guidance;
- access to training and education programs;

- access to information about job fairs and workshops;
- access to information on the labor market;
- assistance with searching for jobs;
- resume and cover letter preparation;
- practice interviewing for jobs;
- free computer and internet access; and
- help registering with and using NCWorks Online.

Services provided to employers include:

- job applicant screening and qualified candidate referrals;
- valuable and up-to-date labor market information and projections, including wage data;
- information on tax credits for hiring particular groups of workers;
- space to conduct job interviews;
- assistance arranging job fairs;
- workshops on employer-related subjects;
- employee training resources;
- layoff/closure prevention services for employers; and
- information about federal bonding (insurance for hiring at-risk workers).

North Carolina Community College System

The North Carolina Community College System (NCCCS) provides a comprehensive array of educational and training programs and a diverse set of services to individuals and employers through 58 community colleges. It is the third largest community college system in the nation with programs and services provided through the college's multi campus locations and supported by the system office in Raleigh. Annually, the 58 community colleges serve greater than 700,000 individuals. The North Carolina Community College System staff provide state-level administrative support for the System under the direction of the State Board of Community Colleges.

Educational and training programs offered at the 58 colleges plus 160+ other campuses/and off-campus locations include a diverse group of programmatic and course offerings organized into several administrative programmatic areas which include Curriculum programs, Continuing Education programs, Economic Development programs and College and Career Readiness adult education programs. Curriculum programs operated by the NCCCS include a variety of educational programs which range in length from one semester to two years. Within the NCCCS Curriculum program area are those post-secondary programs which receive part of their funding through the U.S. Department of Education's Carl D. Perkins Career and Technical Educational Act.

Continuing Education Programs operated by the North Carolina Community Colleges include non-credit courses related to a diverse set of occupational training, workforce development training, community service training and business and industry training. Courses are designed to assist individuals in gaining short term training and skill enhancement including occupational skills, entrepreneurial skills, personal growth and development. Organized within the North Carolina Community College Continuing Education programs are several programmatic areas including Workforce Continuing Education Training and Human Resources Development programs.

The NCCCS Economic Development area oversees several of the state's workforce training initiatives including ApprenticeshipNC, BioNetwork, Customized Training and the Small Business Center Network. ApprenticeshipNC is an employer-driven program that combines on-the job learning with related classroom instruction. BioNetwork provides education for the life science industry sector across the state. Customized Training supports existing, expanding and new companies through specialized training for both pre and post-hire needs. Small Business Centers support entrepreneurial opportunities across the state of North Carolina through the provision of training and technical assistance.

The NCCCS Career and College Readiness Adult Education program area oversees educational programs designed to prepare adults with basic academic knowledge and job readiness skills to obtain high school equivalency, prepare for post-secondary training, and/or occupational job training for in-demand jobs. The state's 58 community colleges are legislatively mandated to provide basic skills instruction to improve reading, writing, math and English language skills to adults functioning below secondary level and/or need to earn a high school equivalency.

The Career and College Readiness program area is responsible for the administration of the state's WIOA Title II, Adult Education and Family Literacy Act (AEFLA) programs. AEFLA programs serve every NC county through community colleges and community-based organizations. Through a competitive request for proposal process, eligible providers apply for Title II funds to supplement their adult education programs. Competitive applicants are awarded funds to work collaboratively with core WIOA partners to provide services and activities that improve adult literacy skills and knowledge for postsecondary transition and/or employment. The Curriculum and Workforce Continuing Education departments, Registered NC Apprenticeships /work units of NC community colleges are the main training partners for adult education providers. This allows for an increased capacity for Title II Adult Education providers to implement accelerated models of credential attainment such as Integrated Education and Training and Pre-Apprenticeships linked to Registered Apprenticeships, and models that specifically support English language learners.

North Carolina's Community College System and its 58 colleges are a valuable component of the NCWorks system. The colleges provide a diverse group of program offerings with many of the programs included on the state's Eligible Training Provider list. A large proportion of the state's WIOA training services are provided through the North Carolina Community Colleges. In addition, many of the colleges serve as contractors for WIOA services and 11 sponsor NCWorks Career Centers on their campuses.

North Carolina Department of Health and Human Services

The North Carolina Department of Health and Human Services (DHHS) is overseen by a Secretary who is appointed by the Governor and is comprised of several divisions and programs which directly provide, or facilitate the provision of a wide range of essential services to the citizens of North Carolina with the aim "to improve the health, safety, and well-being of all North Carolinians." The efforts of DHHS are aimed at "advancing innovative solutions that foster independence, improve health and well-being."

To meet this mission of improving the health, safety and well-being of all North Carolinians while being good stewards of resources, DHHS is addressing the conditions in which people live that directly impact health, known as "social determinants of health," or SDOH. DHHS is focusing on housing stability, food security, transportation access and interpersonal safety. Further, DHHS is prioritizing three primary areas including early childhood through the Early Childhood Action Plan, the Opioid crisis and Healthy Opportunities. Employment is a key social determinant of health which positively influences the other SDOH's and each of the primary areas being prioritized by DHHS.

The agency has administrative responsibility for several divisions that provide workforce development related services and activities. These include the Division of Social Services (DSS), the Division of Aging and Adult Services (DAAS); the Division of Mental Health, Developmental Disabilities and Substance Abuse

Services (MH/DD/SAS), the Division of Vocational Rehabilitation Services (DVRS) and the Division of Services for the Blind (DSB).

The Division of Social Services provides administrative oversight for the state's WorkFirst Temporary Assistance to Needy Families (TANF) employment program, the Food and Nutrition Employment and Training Program (SNAP E&T), and the Community Services Block Grant programs. DSS provides oversight and support to the 100 county social services agencies that deliver benefits and services to individuals and families. The Division of Aging and Adult Services has administrative responsibilities for the Senior Community Service Employment Services, while the Division of Mental Health, Developmental Disabilities and Substance Abuse Services oversees the Long-Term Vocational Support Services.

In North Carolina there are two entities with administrative responsibility for the services provided under the WIOA Title IV Rehabilitation Act program: The Division of Vocational Rehabilitation Services (DVRS) and the Division of Services for the Bind (DSB). Both DVRS and DSB are administratively housed within the North Carolina Department of Health and Human Services. DSB is responsible for administration of Vocational Rehabilitation Title IV services to individuals who are blind, deafblind, and visually impaired and the DVRS is responsible for administration of VR Title IV services to individuals with all other disabilities.

Combined, North Carolina has 80 local vocational rehabilitation office locations that provide counseling staff, vocational evaluators, human resource placement specialists, and other staff as appropriate to meet the needs of those individuals who require the specialized services offered by the vocational rehabilitation programs. Specific arrangements and staffing patterns by the vocational rehabilitation program staff vary from site to site depending on local needs and agreements.

The North Carolina Department of Health and Human Services and its divisions and programs are a critical component of the NCWorks system. DHHS works to ensure that persons with disabilities as well as TANF Employment and Training ("WorkFirst") and SNAP Employment and Training ("FNS E&T") participants and other workforce program participants are able to access core workforce services matching their unique needs. Vocational Rehabilitation staff participate on Local Workforce Development Boards, and the DHHS secretary is a member of the NCWorks Commission. DHHS remains an active partner with the NCWorks Commission, the NC workforce development system and supports the NCWorks system to provide more universal access to placement and training services; to integrate programs by offering a common core of information and services; and by offering consumers more choices regarding where and how they get services.

North Carolina's workforce agencies have enhanced their partnerships, locally, regionally, and at the statewide level over the last several years to ensure coordination of programs and capacity to serve its citizens and businesses. The NCWorks Commission will continue to review and evaluate the capacity of programs to provide high quality customer-focused services across the state and to monitor core partner collaboration and effectiveness in serving the state's citizens and businesses.

(b) **State Strategic Vision and Goals**

(1) Vision

Governor Roy Cooper has outlined a vision for North Carolina's workforce development system that is predicated by three guiding principles: education and skills attainment is the foundation to a strong and resilient workforce; an employer led workforce development system is key to the growth of a highly skilled and job ready workforce; and local innovation is critical to a dynamic and effective workforce system. Governor Cooper's vision is being implemented through his NC Job Ready initiative and the NCWorks Commission has incorporated the Governor's vision into its strategic plan.

The mission of the state's workforce development system, established by the North Carolina State Workforce Development Board, is to ensure that the state has an innovative, relevant, effective and efficient

workforce development system that develops adaptable, work-ready, skilled-talent to meet the current and future needs of workers and businesses. The state's workforce development system is comprised of partners at the state and local level and is collectively referred to as NCWorks. Through its joint efforts, NCWorks helps to grow and sustain economic prosperity for the state and its citizens; helps ensure North Carolinians are ready for the jobs of today and tomorrow by increasing access to education and skills training, fosters employer leadership that helps prepare workers, and supports local innovation that is scalable. North Carolina has a strong workforce development system and the Workforce Innovation and Opportunity Act (WIOA) helps empower the state to prepare its workforce, provide support for the state's businesses and guides how the system connects skilled job seekers to employers.

In early 2019, Governor Cooper, along with state leaders from the North Carolina General Assembly, education and business came together to establish and to commit to work toward a postsecondary educational attainment goal of 2 million North Carolinians (ages 25-44) with a recognized credential beyond high school by the year 2030. This goal is referred to as the myFutureNC goal and was developed through a multi-year combined effort of state education, business, workforce, faith-based and nonprofit community representatives along with representatives from the North Carolina General Assembly and Governor Cooper's staff. The cross-sector collaborative initiative led to the development of, the myFutureNC goal and the establishment of a statewide nonprofit organization myFutureNC, that is focused on the educational attainment of the state's citizens.

The NCWorks Commission developed and adopted a new strategic plan in May of 2019. The plan was developed with interagency input from partners at the state and local level and sets forth a vision and strategic goals for North Carolina's workforce development system. It provides a strategic framework for all workforce programs in North Carolina, including, but not limited to the WIOA core programs. The myFutureNC goal was interwoven into the NCWorks Commission strategy and plan development. The plan focuses on the coordination and alignment for all workforce programs in the state and provided the foundation for the development of North Carolina's Workforce Innovation and Opportunity Act State Unified Plan.

The goal of the Strategic Plan is to create an integrated workforce system that effectively responds to the needs of employers and prepares workers for North Carolina's economy. The strategic plan, titled Preparing North Carolina's Workforce for Today and Tomorrow, sets forth a vision to build a job-ready workforce to strengthen North Carolina companies, attract new businesses, and ensure our state can adapt to a changing economy.

(2) Goals

The NCWorks Commission developed four goals to achieve the state's vision for the workforce system as part of its strategic plan, each of which will employ several strategies. These goals are defined at the workforce system level and address both (a) preparation and education needed to develop a skilled workforce and (b) the workforce needs of employers.

Goal 1: Prepare workers to succeed in the North Carolina economy by increasing skills and education attainment. Education is the foundation of a strong workforce. As the skill requirements of jobs increase and change rapidly, businesses need to find people with the right skills for the jobs they create, and North Carolinians need access to training, so they can be ready for those jobs.

Goal 2: Create a workforce system that is responsive to the needs of the economy by fostering employer leadership. Employer-led job training programs have the best career outcomes. Employers know best what skills their workers need, and employer involvement is key for workforce development and job readiness. Businesses that invest in developing North Carolina's workforce will benefit from well-trained employees and access to more innovative and diverse workplace that better reflects its community.

Goal 3: Promote replication of creative solutions to challenging workforce problems by supporting local innovation. Communities across North Carolina are developing innovative and successful local models of workforce development. North Carolina should build on those successes and replicate them in more places to continue building and expanding innovative solutions.

Goal 4: Promote System Access, Alignment, Integration, and Modernization. North Carolina's workforce system includes multiple agencies, programs, and funders. Collaboration, policy alignment, systemic communication, integration, and modernization of the workforce system will ensure a strong and healthy workforce system that can adapt to a changing economy.

The goals listed in the 2019-2021 Strategic Plan serve as the basis for the 2020-2024 Workforce Innovation and Opportunity Act Unified State Plan and are consistent with those of the strategic plans for the agencies that administer the core programs under WIOA. In addition, they align with Governor Cooper's NC Job Ready initiative, which is built on three core principles: (1) skills and education attainment so North Carolinians are ready for the jobs of today and tomorrow, (2) employer leadership to remain relevant to evolving industry needs, and (3) local innovation to take great ideas and apply them statewide. Furthermore, the NCWorks Commission goals integrate and align with the myFutureNC statewide attainment goal.

ALIGNMENT OF AGENCY STRATEGIC PLANS WITH NCWORKS COMMISSION STRATEGIC PLAN

NCWorks Commission (2019-2021)	Goal 1: Prepare workers to succeed in the NC economy by increasing skills and education attainment.	Goal 2: Create a workforce system that is responsive to the needs of the economy by fostering employer leadership.	Goal 3: Promote replication of creative solutions to challenging workforce problems by supporting local innovation.	Goal 4: Promote System **Access**, Alignment, Integration, and Modernization.	Goal 4: Promote System Access, **Alignment, Integration, and Modernization.**
myFutureNC Commission Attainment Goal for NC (2019-2030)	By 2030, 2 million North Carolinians (25-44) with a high-quality postsecondary degree or credential	*The overall goal can be achieved with the help of various strategies in the NCWorks Commission strategic plan -- employer engagement, systemwide action (including local solutions), system access, and alignment.*			
State Board of Education (plan in effect through 6/2020)*	Goal 1: Every student in the NC Public School System graduates ready for work, further education and citizenship.		*Goal 4 (see far right column) – focus on school districts*	Goal 2: Every student has a personalized education. Goal 3: Every student, everyday has excellent educators. Goal 6: Ensure equity of educational opportunity for all students.	Goal 4: Every school district has up-to-date financial, business, and technology systems to serve its students, parents, and educators. Goal 5: Every student is healthy, safe, and responsible

NCWorks Commission (2019-2021)	Goal 1: Prepare workers to succeed in the NC economy by increasing skills and education attainment.	Goal 2: Create a workforce system that is responsive to the needs of the economy by fostering employer leadership.	Goal 3: Promote replication of creative solutions to challenging workforce problems by supporting local innovation.	Goal 4: Promote System **Access**, Alignment, Integration, and Modernization.	Goal 4: Promote System Access, **Alignment, Integration, and Modernization.**
State Board of Community Colleges (2018-2022)	Goal 2: Clear and Supported Pathways for Student Progress and Success Goal 3: Economic and Workforce Impact	Goal 3: Economic and Workforce Impact *(employer engagement, work-based learning objectives)*		Goal 1: Student Interest and Access	Goal 4: System Effectiveness
University of NC Board of Governors (2017-2022)	Goal 2: Student Success	Goal 4: Economic Impact and Community Engagement	Goal 5: Excellent and Diverse Institutions	Goal 1: Access Goal 3: **Affordability** and Efficiency	Goal 3: Affordability and **Efficiency**
Department of Health and Human Services (2019-21)	Goal 1: Advance the health and well-being of North Carolinians utilizing the programmatic tools of the Department. Goal 2: Build an innovative an innovative, coordinated, and whole-person-centered system that addresses both medical and non-medical drivers of health. Goal 4: Ensure all NC children get a healthy start and develop to their full potential in safe and nurturing families, schools, and communities.	Goal 3: Turn the tide on North Carolina's opioid crisis. Goal 2: Build an innovative an innovative, coordinated, and whole-person-centered system that addresses both medical and non-medical drivers of health. Goal 5: Achieve Operational Excellence	Goal 4: Ensure all NC children get a healthy start and develop to their full potential in safe and nurturing families, schools, and communities Goal 2: Build an innovative an innovative, coordinated, and whole-person-centered system that addresses both medical and non-medical drivers of health. Goal 5: Achieve Operational Excellence	Goal 2: Build an innovative an innovative, coordinated, and whole-person-centered system that addresses both medical and non-medical drivers of health. Goal 5: Achieve Operational Excellence	Goal 3: Turn the tide on North Carolina's opioid crisis. Goal 2: Build an innovative an innovative, coordinated, and whole-person-centered system that addresses both medical and non-medical drivers of health. Goal 5: Achieve Operational Excellence

*A proposed State Board of Education strategic plan for 2020-25 has three overarching goals: "Eliminate opportunity gaps between students by 2025"; "Improve school and district performance by 2025"; and "Increase educator preparedness to meet the needs of every child by 2025

(3) Performance Goals

The tables below provide the anticipated levels of performance for Title I, Title II, Title III and Title IV programs. These performance levels are based on year-end performance figures from PY 2018. At this time, program year goals for PY 2020 and PY 2021 have not yet been negotiated.

	Title I – Adult Program			
	Program Year: 2020		Program Year: 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	78.0%	Not Yet Negotiated	79.0%	Not Yet Negotiated
Employment (Fourth Quarter after Exit)	75.0%	Not Yet Negotiated	76.0%	Not Yet Negotiated
Median Earnings (Second Quarter after Exit)	$5,500	Not Yet Negotiated	$5,600	Not Yet Negotiated
Credential Attainment Rate	55.0%	Not Yet Negotiated	56.0%	Not Yet Negotiated
Measurable Skill Gains	40.0%	Not Yet Negotiated	41.0%	Not Yet Negotiated

	Title I – Dislocated Worker Program			
	Program Year: 2020		Program Year: 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	76.0%	Not Yet Negotiated	77.0%	Not Yet Negotiated
Employment (Fourth Quarter after Exit)	75.0%	Not Yet Negotiated	76.0%	Not Yet Negotiated
Median Earnings (Second Quarter after Exit)	$6,500	Not Yet Negotiated	$6,600	Not Yet Negotiated

	Title I – Dislocated Worker Program			
	Program Year: 2020		Program Year: 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Credential Attainment Rate	59.0%	Not Yet Negotiated	60.0%	Not Yet Negotiated
Measurable Skill Gains	50.0%	Not Yet Negotiated	51.0%	Not Yet Negotiated
	Title I – Youth Program			
	Program Year: 2020		Program Year: 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit) [1]	70.0%	Not Yet Negotiated	71.0%	Not Yet Negotiated
Employment (Fourth Quarter after Exit)[2]	73.0%	Not Yet Negotiated	74.0%	Not Yet Negotiated
Median Earnings (Second Quarter after Exit)	$2,800	Not Yet Negotiated	$2,900	Not Yet Negotiated
Credential Attainment Rate	53.0%	Not Yet Negotiated	54.0%	Not Yet Negotiated
Measurable Skill Gains	41.0%	Not Yet Negotiated	42.0%	Not Yet Negotiated

	Title II – Adult Education and Family Literacy Act Program			
	Program Year: 19-20		Program Year: 2020-21	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	37%	Not yet Negotiated	37%	Not yet Negotiated

[1] For Title I Youth programs, employment, education or training.

[2] For Title I Youth programs, employment, education or training.

	Title II – Adult Education and Family Literacy Act Program			
	Program Year: 19-20		Program Year: 2020-21	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Fourth Quarter after Exit)	13%	Not yet Negotiated	15%	Not yet Negotiated
Median Earnings (Second Quarter after Exit)	$3,556.00	Not yet Negotiated	$3,627.00	Not yet Negotiated
Credential Attainment Rate	29%	Not yet Negotiated	30%	Not yet Negotiated
Measurable Skill Gains	42%	Not yet Negotiated	45%	Not yet Negotiated

	Title III - Wagner-Peyser Act Employment Service Program			
	Program Year: 2020		Program Year:	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	72.0%	Not Yet Negotiated	73.0%	Not Yet Negotiated
Employment (Fourth Quarter after Exit)	72.0%	Not Yet Negotiated	73.0%	Not Yet Negotiated
Median Earnings (Second Quarter after Exit)	$4,900	Not Yet Negotiated	$5,000	Not Yet Negotiated
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable

	Title IV: Vocational Rehabilitation Program			
	Program Year:		Program Year:	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit) [22]	60%	Baseline	60%	Baseline
Employment (Fourth Quarter after Exit) [22]	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter after Exit [3]	$2,900	Baseline	$2,900	Baseline
Credential Attainment Rate [22]	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains	35%	Baseline	35%	Baseline

(4) Assessment

The NCWorks Commission is responsible for evaluating the effectiveness of the state's workforce development system. These evaluation and assessment activities are overseen by the NCWorks Commission's Governance and System Alignment Committee. In support of this responsibility the commission carries out several tasks including : (a) conducting annual reviews of all workforce program plans to identify gaps in service, duplication and opportunities for better alignment; (b) developing and reporting on performance measures for all workforce programs annually; (c) implementing a system-wide customer satisfaction survey for both businesses and job seekers; (d) requiring a joint WIOA core programs report to be submitted annually regarding implementation of WIOA to ensure adherence to the state plan; and (e) engaging outside consultation for third-party review, analysis, evaluation and recommendations for continuous improvement of services and resulting outcomes.

North Carolina has a longitudinal workforce data system, the North Carolina Common Follow-up System (CFS), that was originally established in the early 1990's. The CFS is mandated under state law and is jointly operated by the North Carolina Department of Commerce's Labor and Economic Analysis Division and the North Carolina Department of Information Technology. The CFS is utilized to help in the assessment of the state's workforce programs including the assessment of employment and wage outcomes. North Carolina received a Workforce Data Quality Initiative (WDQI) grant in 2013 and a second WDQI grant in 2019 to help support enhancement and expansion of the CFS. Information from the CFS is utilized to support the NCWorks Commissions' program evaluation and assessment responsibilities. In addition, LEAD is working closely with the myFutureNC nonprofit to provide information and technical assistance in developing measures to help assess the state's progress on the myFutureNC goal.

[3] For the VR program, these indicators are Not Applicable for PY 2020 and PY 2021; however, they will be applicable for PY 2022 and PY 2023.

The NCWorks Commission will continue to utilize the information, data, and evaluations listed above to advise the Governor, General Assembly, and other state leaders on how to continue to improve the state's workforce development system to ensure it is well-coordinated, customer-focused, high-quality, inclusive and meeting the needs of both individuals and businesses.

(c) **State Strategy**

The NCWorks Commission's strategic plan defined the strategies necessary for achieving each of the four goals. These strategies identified by the commission and through stakeholder input and engagement are centered in four areas: skills and education attainment, employer leadership, local innovation, and governance and system alignment. These strategies formed the foundation for the NCWorks Commission's plan of action and guided the development of its committee structure.

Increasing Skills and Education Attainment

Education is the foundation to a strong workforce. As the skill requirements of jobs increase and change rapidly, businesses need to find people with the right skills for the jobs they create, and North Carolinians need access to training, so they can be ready for those jobs. Below are specific strategies identified to help increase skills and education attainment and to ensure North Carolina has the best workforce development system in the country.

- **Increase career awareness.** Every North Carolinian needs access to quality career information that will help them identify occupations and jobs that are growing in their area and available training programs that can help to prepare them for those jobs. Career information includes individual experiences with employers and access to data and career exploration tools. A new web portal NCCareers.org is currently in development and will be deployed in the spring of 2020. NCCareers.org will help students identify promising careers while assisting business leaders to find skilled workers and empowering educators to guide students towards the best career paths for the future.
- **Advocate for increased educational attainment.** Enhance education and training programs that help to raise the high school graduation rate and improve technical curriculums offered in an effort to increase the number of North Carolinians with a post-secondary degree, credential, or certificate. These enhancements will help address the education attainment gap in North Carolina and make progress toward the myFutureNC 2030 goal of 2 million North Carolinians between the ages of 25 and 44 with a high-quality postsecondary degree or credential.
- **Promote access to job training for high-demand fields.** Too many employers have job openings that remain unfilled because of a lack of workers with the right skills. It should be easier for workers to get training in those fields and keep North Carolina's employers growing.
- **Increase access to education for those that have barriers.** The cost of school is more than tuition. Supporting North Carolinians including those with disabilities and other barriers to employment who need help with things like childcare, accessible transportation and the cost of books and materials while they get trained for a new career is critical.

Fostering Employer Leadership

North Carolina will proactively address the changing needs of the economy for a job-driven system by strengthening and expanding business engagement strategies. Employer-led job training programs have the best career outcomes. Employers know best what skills their workers need, and employer involvement is key for workforce development and job readiness. Businesses that invest in developing North Carolina's workforce will benefit from well-trained employees and a more innovative and diverse workplace that better reflects its community. Below are specific strategies identified to ensure a stronger connection to the business community and to ensure that the workforce system is meeting the needs of the economy.

- **Support efforts to increase work-based learning opportunities.** With increased employer engagement, expose students to career opportunities through career awareness and career exploration. Work-based learning also includes internships, pre-apprenticeships, youth apprenticeships and registered apprenticeships where students experience real-world professional environments.
- **Enhance programs to enable employers to provide training for new and existing employees.** Successfully upskilling workers will enable employers to promote from within and bring in new employees to fill the vacancies. This will help to develop a job-ready North Carolina.
- **Develop and implement industry-led partnerships.** As market dynamics shift quickly, North Carolina needs to adapt and respond to the evolving needs of businesses. The 23 North Carolina Local Workforce Development Boards are in a unique position to lead business engagement strategies in their local communities. Diversity among partner agencies is important, and all agencies, business entities and associations engaged in economic and workforce development will collaborate to fully understand business needs and efficiently deliver the right services to address those needs through sector strategy models.

Supporting Local Workforce Innovation

North Carolina's workforce development system is supporting communities across North Carolina that are developing great local models of workforce development. North Carolina is building on these successes by highlighting them for replication to continue to build and expand innovative workforce solutions. Below are specific strategies identified to ensure North Carolina's workforce development system is innovative.

Advance leadership development opportunities to workforce professionals. Local education and workforce partnerships drive successful career readiness initiatives. Investing in these local leaders will increase the capacity of their programs and help them better their communities.

Provide funds to innovate and replicate good ideas. Local leaders know their communities best, and they deserve support in piloting new ideas designed for their areas. When those innovations are successful, other communities throughout the state should hear about the success and have the tools and funds necessary to replicate proven programs.

Promoting Governance and System Alignment

North Carolina's workforce system includes multiple agencies, programs and funding streams. Collaboration, policy alignment, systemic communication, integration and modernization of the workforce system will ensure a strong and healthy workforce system that can adapt to a changing economy. Below are specific strategies identified to ensure North Carolina's workforce development system has strong system integration while fostering collaboration.

- **Continue to strengthen system integration**. Better coordination and communication among North Carolina Department of Public Instruction, North Carolina Community College System, University of North Carolina System, North Carolina Independent Colleges and Universities, North Carolina Department of Health and Human Services, the 23 Local Workforce Development Boards, North Carolina Department of Commerce and North Carolina Department of Administration and community-based organizations will promote a more integrated workforce development system.
- **Support better awareness, communication, accessibility, and understanding of the NCWorks brand.** Demonstrating and sharing what NCWorks can do for individuals and businesses can help create a recognizable identity and brand to all customers that access the career center system to increase awareness. Making the system user-friendly, accessible, and

navigable is crucial. NCWorks has recently unveiled a new logo to unite career centers across North Carolina as proud partners of the American Job Center Network.

- **Research advanced technology for marketing to adapt to new generations entering the workforce.** As users of the system continue to evolve, so too should the way they interact and use the system. Keeping up with the changing skill demands and needs for customers will ensure that our workforce system remains nimble and adaptive.
- **Measure and report on the effectiveness of the workforce development system including the usage and quality of services.** Collecting, understanding, and using data effectively is critical in guiding a successful workforce development system.

Implementation and Performance Measurement

The three agencies responsible for the core WIOA programs work together in local, regional, and state-level teams to meet the needs of individuals and employers in North Carolina. As a system, NCWorks will implement strategies identified in this plan to ensure job seekers and businesses have access to all services across programs. The strategies in North Carolina's WIOA State Unified Plan will result in a workforce system that is more fully integrated and allows all customers to access timely and relevant services from a multitude of touch points wrapped around a customer service core.

North Carolina has continued to strengthen its integrated service delivery system for the WIOA core programs. The NCWorks system fosters better coordination between the entire workforce development system. In addition, North Carolina has a strong career pathways strategy which has developed 36 comprehensive career pathways that all individuals can use to plan their career and obtain economically sustaining employment. North Carolina will continue to implement the key strategies in the unified plan to help students and job seekers achieve economic prosperity.

Across North Carolina, workforce development, education and economic development organizations are hard at work meeting the needs of businesses and connecting people to jobs. However, without a coordinated strategy to ensure that resulting initiatives are targeted and aligned, there is a risk of duplicating efforts and developing programs without an integrated understanding of business needs. Ultimately, this could lead to a disconnect between workforce supply and demand, with long-term consequences for North Carolina's businesses and communities.

The North Carolina State Sector Strategy Council was formed to address these challenges. Key leaders from the North Carolina Community College System Office, the NC Department of Commerce, EDPNC, the NCWorks Commission, the Cumberland County Workforce Development Board, and the Governor's Office (all comprising the North Carolina State Sector Strategy Council), have come together to clarify a state mission and strategy for supporting collaborative business engagement through industry-led sector partnerships. The ultimate goal of the Council is to support the development of local and regional sector partnerships that:

- Provide a source of high-quality, real-time information on what businesses need to inform education, workforce development and economic development efforts;
- Foster sustained partnerships with business, encouraging private sector leaders to co-invest in solutions;
- Act as a coordinating body for education, workforce development and economic development partners to develop efficient and effective responses to industry needs, including development of certified career pathways.

In North Carolina, Career Pathways are established and administered at the local level, the state has pushed to make sector strategies a focus to move the workforce development system forward. Work-based

learning has been made a priority by awarding grants to local workforce boards that provide business service staffing for increased employer engagement. All local workforce boards have access to these grants, which put an emphasis on in-demand industry sectors, and occupations through work experience and OJT programs.

North Carolina has developed an NCWorks Local Innovation Fund, a grant program launched by Governor Cooper and administered by the Department of Commerce Division of Workforce Solutions and the NCWorks Commission. The grant provides funding for local communities to pilot innovative programs or replicate successful program models that address a local or regional workforce issue; specifically targeting an underserved or under resourced community or population. Communities assembled collaborative teams to design and implement a set of solutions to a workforce issue. Teams include representatives from the local, regional and state level of workforce, education, community, labor and business leaders.

Strategies for strengthening business engagement are also well under way in North Carolina. An inter-agency NCWorks team has coordinated the development of comprehensive employer services literature and brochures for dissemination across all programs and establishing regional business services teams to ensure coordination among Local Workforce Development Boards. Under the Workforce Innovation and Opportunity Act, North Carolina emphasizes local success which is built upon the concepts of (1) regionalism as an approach to engage businesses, (2) creating collaborative partnerships with economic development/education to provide solutions, and (3) developing sector strategies to build talent pipelines. Additionally, a new NCWorks logo has been completed for an increased brand awareness.

The NCWorks Commission continues to track the progress of these strategies, successful completion, and evaluating the overall effectiveness of the state's workforce development system. To accomplish this task, the commission has several key responsibilities including:

- conducting annual reviews of all workforce program plans to identify gaps in service, duplication, and opportunities for better alignment;
- developing annual performance measures for all workforce programs;
- developing a task force to address the career center of the future;
- reviewing the local area plans to ensure adherence to the state plan; and
- engaging outside consultation for third-party review, analysis, evaluation and recommendations for continuous improvement of services and resulting outcomes.

The NCWorks Commission will use the information, data and evaluations listed above to advise the Governor, General Assembly and other state leaders on how to continue to improve the state's workforce development system to ensure it is well-coordinated, customer-focused, high-quality, and meeting the needs of both individuals and businesses.

(d) **Strategies to Align Core Programs**

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

Continued agency coordination through the WIOA State Steering Council is critical to continued alignment of core programs. North Carolina's workforce partners realize that the success of the workforce system partners, both jobseekers and employers cannot be made without the support of all of the state's partners working together. One strategic goal for the Division of Workforce Solutions is the development and delivery of training for chief elected officials and workforce board chairs on the responsibilities of the elected officials, Local Workforce Development Boards, economic developers and DWS (as the state

administrative entity tasked with oversight). The training will incorporate data-driven research, analysis and strategic insights that align with the Governor's vision for workforce development as outlined in the NC Job Ready initiative. All WIOA stakeholders will have the opportunity for input to the WIOA Steering Council.

Stronger policy alignment between the NCWorks Commission and core partners will ensure that the workforce development system meets the goals of being well-coordinated, customer-focused, high-quality, and inclusive.

As discussed earlier, strides have been made to improve shared data sharing processes, both to enhance the customer experience, and to ensure that economic data and benchmark metric information provided to all core partners.

The Division of Workforce Solutions is in the final stages of developing a strategic plan that addresses the issue of alignment of each of the WIOA core programs and aligned with the strategic goals of the NCWorks Commission. This strategic plan is based on Governor Cooper's workforce development initiative, *NC Job Ready*, to ensure North Carolinians are ready for the jobs of today and tomorrow. Building a stronger workforce through skills and education attainment, employer leadership, and local innovation are key components of NC Job Ready. The Division of Workforce Solutions three-year strategic plan establishes goals and initiatives that are aligned to these three components of his NC Job Ready initiative. DWS is the administrator for WIOA Title I & WIOA Title III and their strategic plan will align with the NCWorks Commission's strategic plan and DOL's strategic plan. The first goal in the plan is to foster the alignment of economic and workforce development efforts that lead to enhanced business relationships and expansion of service provision and solutions.

Improving the flow of data between economic development and workforce development, at the statewide, regional and local levels, and enhancing the strategic partnership between workforce development and economic development partners, is critical to meeting the needs of both employers and jobseekers. Moreover, strengthening this alliance will help workforce officials add value to the economic development process and aid the NCWorks system in being more response to the needs of the state's existing, expanding and new businesses and industries.

Describe the strategies the State will use to align the core programs, any Combined State Plan partner programs included in this Plan

Goal 1: Prepare workers to succeed in the North Carolina economy by increasing skills and education attainment.

Strategies to achieve Goal 1:

- Increase career awareness. Every North Carolinian needs access to career information that will lead them to jobs that are growing in their area and which training programs can prepare them for those jobs. Career information includes individual experiences with employers and access to data and career exploration tools.
- Advocate for increased educational attainment. Enhance programs to raise the high school graduation rate and improve the technical curriculums offered in an effort to increase the number of North Carolinians with a post-secondary degree, credential, or certificate to address the education attainment gap in North Carolina and make progress toward the goal of myFutureNC that, by 2030, 2 million North Carolinians between the ages of 25 and 44 years old have a high-quality postsecondary degree or credential.
- Promote access to job training for high-demand fields. Too many employers have job openings that remain unfilled because of a lack of workers with the right skills. It should be easier for workers to get training in those fields and keep our employers growing.

- Increase access to education for those that have barriers. The cost of school is more than tuition. Supporting North Carolinians including those with disabilities and other barriers to employment is critical.

Goal 2: Create a workforce system that is responsive to the needs of the economy by fostering employer leadership.

Strategies to achieve Goal 2:

- Support efforts to increase work-based learning opportunities. With increased employer engagement, expose students to career opportunities through career awareness and career exploration. Work-based learning also includes internships, pre-apprenticeships, youth apprenticeships and registered apprenticeships where students experience real-world professional environments.
- Enhance programs to enable employers in high growth sectors to provide training for new and existing employees. Successfully upskilling workers will enable employers to promote from within and bring in new employees to fill the vacancies. This will help to develop a job-ready North Carolina.
- Develop and implement targeted industry-led partnerships in growing industries. As market dynamics shift quickly, North Carolina needs to adapt and respond to the evolving needs of businesses. The 23 North Carolina Local Workforce Development Boards are in a unique position to lead business engagement strategies in their local communities. Diversity among partner agencies is important, and all agencies, business entities and associations engaged in economic and workforce development will collaborate to fully understand business needs and efficiently deliver the right services to address those needs through sector strategy models.

Goal 3: Promote replication of creative solutions to challenging workforce problems by supporting local innovation.

Strategies to achieve Goal 3:

- Advance leadership development opportunities to workforce professionals. Local education and workforce partnerships drive successful career readiness initiatives. Investing in these local leaders will increase the capacity of their programs and help them better their communities.
- Provide funds to innovate and replicate good ideas. Local leaders know their communities best, and they deserve support in piloting new ideas designed for their areas. When those innovations are successful, other communities throughout the state should hear about the success and have the tools and funds necessary to replicate proven programs.

Goal 4: Promote System Access, Alignment, Integration, and Modernization.

Strategies to achieve Goal 4:

- Continue to strengthen system integration. Better coordination and communication among WIOA Core Partners, North Carolina Department of Public Instruction, North Carolina Community College System, University of North Carolina System, North Carolina Independent Colleges and Universities, North Carolina Department of Health and Human Services, the 23 Local Workforce Development Boards, North Carolina Department of Commerce and economic development partners, and North Carolina Department of Administration and community-based organizations will promote a more integrated workforce development system.
- Support better awareness, communication, accessibility, and understanding of the NCWorks brand. Demonstrating and sharing what NCWorks can do for individuals and businesses can help create a recognizable identity and brand to all customers that access the career center system to increase awareness. Making the system user-friendly, accessible and navigable is crucial.
- Research advanced technology for marketing to adapt to new generations entering the workforce. As users of the system continue to evolve, so too should the way they interact and use the system.

Keeping up with the changing skill demands and needs for customers will ensure that our workforce system remains nimble and adaptive.

- Measure and report on the effectiveness of the workforce development system including the usage and quality of services. Collecting, understanding, and using data effectively is critical in guiding a successful workforce development system.

III. OPERATIONAL PLANNING ELEMENTS

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

(a) State Strategy Implementation. The Plan must include–

(1) State Board Functions.
(2) Implementation of State Strategy. Describe how the lead State agency with responsibility for the administration of each core program included in this plan will implement the State's Strategies identified in II(c) above. include a description of—
(A) Core Program Activities to Implement the State's Strategy.
(B) Alignment with Activities outside the Plan.
(C) Coordination, Alignment and Provision of Services to Individuals.
(D) Coordination, Alignment and Provision of Services to Employers.
(E) Partner Engagement with Educational Institutions.
(F) Partner Engagement with Other Education and Training Providers.
(G) Leveraging Resources to Increase Educational Access.
(H) Improving Access to Postsecondary Credentials.
(I) Coordinating with Economic Development Strategies.

(a) State Strategy Implementation

The Unified or Combine State Plan must include –

(1) State Board Functions.

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

State Board Operational Structures and Processes

The NCWorks Commission is the designated State Workforce Development Board for the state of North Carolina. The commission operates in accordance with the federal Workforce Innovation and Opportunity Act, North Carolina General Statute, and commission bylaws. Commission members are appointed by the Governor and appointees are given the responsibility for setting the strategic direction of the state-wide workforce development system. Commission members advise state leaders on how to strengthen the state's workforce and serve North Carolina businesses. The commission has several responsibilities including the development of policies for the alignment of workforce programs, assessment of the effectiveness of North Carolina's core and partner programs, and oversight of the NCWorks Career Center system.

Membership

Representation on the NCWorks Commission is mandated by federal and state law. Commission membership includes workforce agency leaders, elected officials, private sector members, representatives from labor, training, and community-based organizations as well as the WIOA core partner, Title II program. As defined under the WIOA, the majority of the members are from the private sector. All members are appointed to four-year terms by the Governor. The heads of the North Carolina Department of Health and Human Services, North Carolina Department of Administration, North Carolina Department of Public Instruction, North Carolina Community College System, University of North Carolina System, and North Carolina Department of Commerce all serve as ex-officio members.

Committees

The work of the NCWorks Commission is accomplished through the work of its committees. These committees, established by the chair, are created purposefully to accomplish the goals of the commission's biennial strategic plan and to carry out the functions under section 101(d) of WIOA. Each committee is led by a chair and is supported by staff. The NCWorks Commission has an Executive Committee which is comprised of the Commission chair and chairs of each of the four committees.

Staff

The North Carolina Department of Commerce provides staff support to the commission to carry out the commission's duty to develop an effective and efficient workforce development system. Staff consists of a director, deputy director and persons engaged in administrative, policy, technical research and support areas. Staff is responsive to the needs of the commission and initiates actions necessary to support the commission in its mandated functions.

Meetings

The commission conducts quarterly business meetings at the call of the chair. Business meetings are attended by the entire commission and are open to the public. Meeting agendas are developed by commission staff and approved by the chair. Actions of the commission are determined by a majority vote of the members present, and a majority of the commission constitutes a quorum for the transaction of business. The rules set forth in Robert's Rules of Order, Newly Revised govern the procedures of the commission.

Each of the NCWorks Commission's committees meet several times a year and are scheduled at the discretion of the committee chair. These meetings are attended by the assigned committee members, its chair, and appropriate staff.

(2) Implementation of State Strategy.

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

Core Program Activities to Implement the State's Strategy.

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

NC Job Ready is Governor Cooper's workforce development initiative to ensure North Carolinians are ready for the jobs of today and tomorrow. NC Job Ready focuses on three priorities: skills and education attainment, employer leadership, and local innovation. The core programs in WIOA will align and achieve the strategies identified in North Carolina's State Unified Plan by emphasizing these priorities. The NCWorks Commission's 2019-2021 strategic plan will provide the foundation for this work and will continue to track the success of the plan. Below are the four major goals that form the basis of the strategic plan. These goals are to:

1) Prepare workers to succeed in the North Carolina economy by increasing skills and education attainment;

- Related to the education attainment component of this goal, the plan calls for making progress toward the goal set by the myFutureNC Commission: that by 2030, 2 million North Carolinians between the ages of 25 and 44 years old have a high-quality postsecondary degree or credential. Governor Cooper recently signed House Bill 664 into law, codifying this statement attainment goal.

Title II will collaborate with NC Community College System to support Integrated Education and Training (IET) implementation to accelerate skills while beginning the path to earning an industry recognized certification. Title II will provide professional development for training providers and Adult Education programs on creating concurrent enrollment opportunities in programs of study assessed to be in high demand in the local areas. In addition, Title II will work with local NC Works Career Centers to support career services and provide training vouchers for the Title II IET.

2) Create a workforce system that is responsive to the needs of the economy by fostering employer leadership;

- Employer leadership includes an emphasis on supporting increased work-based learning programs to expose students to career opportunities through career awareness and career exploration such as internships and apprenticeships and developing industry-led partnerships to ensure workforce agencies are working together to address business needs.

3) Promote replication of creative solutions to challenging workforce problems by supporting local innovation;

- "Local innovation" calls for promoting leadership development opportunities for the state's workforce professionals, and for funding community-based initiatives that pilot new ideas or replicate proven programs.

4) Promote workforce system access, alignment, integration and modernization.

- This goal relates to the coordination of the workforce development system itself, which involves numerous partner agencies. Among other items, the plan calls for enhancing public awareness of the services provided through NCWorks for individuals and businesses, while researching new technological means to serve the system's customers.

Coordinate Across Programs at State and Local Levels

North Carolina continues to integrate programs under WIOA. Currently programs in Titles I and III, operated by the N.C. Department of Commerce, are already developing referral process guidelines to programs in Title IV. The N.C. Department of Commerce will begin work on integrating Title II into the referral process guidelines. N.C. Department of Commerce will provide guidance and technical assistance to local NC Works centers to develop an integrated referral system for services that meet local needs and ensure nonduplication of services and that provide equal access to all eligible clients. As the referral processes are established, based on the guidelines, the state agency leads will meet to quarterly to review and assess referral process efficacy. The WIOA State Steering Council reviews current referral policy and strategies biannually to identify ways to strengthen these processes to avoid duplication of services. The N.C. Department of Commerce works continuously to improve the integration of services to ensure a customer-centered approach to service delivery. This integration is supported by the NCWorks Commission's 2019-2021 strategic plan that cites strengthening system integration as one of their goals to promote the system statewide.

The NCWorks Commission's 2019-2021 strategic plan provides a framework for all workforce programs in North Carolina, including, but not limited to the programs covered under WIOA. The State Steering Council also identified key actions needed to ensure coordination and alignment.

In collaboration with the NCWorks Commission, the WIOA State Steering Council, initially established in 2015 continues as a permanent cross-agency body to coordinate and align policy and ensure continued implementation of WIOA at state and local levels. The council reviews progress on WIOA implementation and develops strategies for improvement. In addition, the council continues to review state policies that may inhibit programs from fully aligning required activities. The council provides feedback to the NCWorks

Commission regarding challenges and barriers to completing the work and offers suggestions for new policy.

Other activities of the WIOA State Steering Council:

A. Review the inter-agency teams at the local and regional levels to enhance alignment of workforce services, as local and regional activities should be aligned to improve the system.

B. Develop a statewide plan and offer resources to provide access to all statewide education and workforce development entities to get all workforce system participants enrolled in NCWorks Online.

    1. NCWorks Online is the state's official job-search portal that helps connect people to jobs and helps businesses find the talent they need. Individuals can develop a resume, assess their skills, find training to gain the skills they need, and apply for jobs. Businesses use the system to post jobs and find the talent they need. In addition, the system includes labor market information by industry, occupation, and region.
    2. Title II and Title IV core partners will collaborate with their local NCWorks Career Center to enroll program participants into NCWorks. NCWorks will provide access and regular training to students.
    3. This system is a valuable tool for individuals, businesses, economic developers, and workforce development partners. As more individuals register and use NCWorks Online, businesses will have a larger pool of talent to select from for their workforce needs. In addition, NCWorks Online can be a valuable tool for showing businesses interested in locating or growing in North Carolina that the state has the workforce they need to be successful.

C. Continue to incorporate and promote the NCWorks brand to help customers recognize the value of the state's workforce development system.
    1. Since 2014, the state of North Carolina has used the name NCWorks to allow the workforce development system to work under one brand name, in order to help customers, individuals, and businesses more easily identify where to access workforce development services.
    2. A refreshed NCWorks brand logo was unveiled at the 2019 NCWorks Partnership Conference, as part of an overall outreach effort. With the new logo, the state's goal of utilizing a single brand to create a more seamless workforce development system is coming to fruition. This brand will be easily identifiable to all customers, no matter where they live in the state. Citizens, businesses, and key stakeholders will find value in North Carolina's workforce development system when complexity is minimized, and services are connected and streamlined.
    3. A single brand for the entire workforce development system reduces, to the extent possible, the focus on individual programs or services and replaces it with a statewide approach. A common brand also reduces confusion for those unfamiliar with the system by simplifying the message and increasing the efficiency of statewide outreach.

D. Develop and implement a system-wide and consistent outreach strategy.
    1. Customers of the state's workforce development system may access more than one service. For example, a business looking to grow may need to increase the size of its workforce immediately but also ensure there is a pipeline of workers to continue to fill those positions. The company may be interested in customized training as well as work-based learning programs to ensure it can meet its current and future workforce needs.

The workforce development system seeks to develop outreach strategies that provide information on the full range of services available.

2. The NCWorks branding and outreach campaign launched by the state in late 2019 seeks to consistently and effectively promote workforce development services. Informed by research, the campaign is focused primarily on North Carolina employers. The main goals of the campaign are to raise awareness of the services specifically for businesses, help to increase usage of the NCWorks program by business leaders, and to amplify NCWorks' voice and visibility across the state.

E. Operationalize employer-driven strategies that engage business leaders in opportunities that develop best practices for sector strategies and career pathways that benefit both employers and jobseekers.

1. There are many ways for employers to engage with the workforce development system who can identify and provide resources for services they need for growth and sustainability and provide opportunities for individuals to gain work experience necessary to be a successful candidate for employment. A recent survey of businesses found that lack of relevant work experience was one of the top three reasons employers were having difficulty finding the talent they need. However, businesses may not be fully aware of the ways they can connect with the workforce development system to provide opportunities that both help individuals gain the experience they need and develop a pipeline of talent to meet the businesses' need.
2. Workforce development entities need to work together to identify all the ways that businesses can interact with the workforce development system from facility tours, to work-based learning activities such as internships and externships, to apprenticeships, incumbent worker training, customized training, continuing education and on-the-job training opportunities. Then, business outreach specialists can share information with the businesses on the full range of activities, across programs, in which a business can engage to help develop the talent needed to grow their business.

F. Create a framework for ensuring cross-trained, qualified staff from all workforce partners including WIOA core partners have the knowledge, skills, and abilities required to support an integrated local delivery system to ensure that North Carolina has the nation's most talented, collaborative professionals and leaders for workforce development.

1. Workforce development staff historically have been deployed to meet the specific mission of the program for which they are employed. Local, regional, and state stakeholders agree that a high level of customer service should be one of the cornerstones of the brand architecture for North Carolina's workforce delivery system. Achieving a high level of customer service is dependent on knowledgeable staff with the confidence and understanding of the system that is required to perform all aspects of their jobs. The NCWorks Training Center, in collaboration with core WIOA partners will develop a Core Partner cross training for all core partner staff.
2. The Division of Workforce Solutions manages the NCWorks Training Center, which achieves its mission by providing a variety of training options tailored to meet the dynamic needs of the Division of Workforce Solutions, NCWorks Career Center staff, the state's 23 Local Workforce Development Boards and staff of partner agencies. These efforts and services help ensure all staff and partners are well-trained with current skills and knowledge relevant to workforce trends. This is accomplished through workshops by professional, peer, and in-house trainers in both face- to-face sessions and online webinars and tutorials. The NCWorks Training Center also provides a vast

list of supportive services including meeting and conference preparation and planning, along with other customized event services as requested.

3. The NCWorks Training Center is readily available with logistical planning of events, registration, data collection, supportive services, and training delivery. The current catalog of 82 interactive online courses successfully enhances accessibility of training on a variety of on demand topics.
4. Several of these courses are bundled into a product entitled *Welcome to Workforce*, which provides a structure for comprehensive system orientation and skill development over a 2-year period. This basic foundation is critical for new staff to acquire a solid understanding of the work they perform and is also a useful refresher for more seasoned staff.
5. The NCWorks Training Center continues to provide workforce development professionals a globally recognized credentialing opportunity through the Facilitating Career Development (FCD) course. This 120-hour course uses the curriculum of the National Career Development Association (NCDA) curriculum and standardizes the knowledge and experience of workforce development professionals and others in career development services. The instructional format blends traditional classroom, web-based distance learning, and independent project completion. This course provides a unique opportunity for workforce professionals from varied perspectives of the career field to network, share ideas and resources and develop new partnerships to benefit the public. This course is offered 4-6 times per year depending on the need.
6. Another credentialing course available and offered as needed is the Business and Employer Services Professional (BESP) course, which is comprised of 40 hours of online work, 2 classroom days, and completion of an independent project. This course is designed for any staff in the NCWorks Career Center who interfaces with the business community and the content encourages for development of strong relationships with business, effective communication skills, and using needs assessment to determine solutions for businesses in recruiting and retaining a viable workforce. The curriculum was developed and is delivered by Lengel Vocational Services and is based on the business services competencies of the FCD course and the National Association of Workforce Development Professionals (NAWDP).
7. The newest initiative led by the Training Center is a comprehensive leadership development course entitled *STAR: Successful Teams Achieve Results.* The course values and structure were developed using a team of workforce professionals that included Workforce Board Directors, senior leadership at the Division, and NCWorks Career Center Managers. The first course was offered in the spring and summer of 2019, with 18 graduates who attended six 2-day sessions over a six-month period. The second class began shortly after and graduated 19 in November of 2019. Plans are underway to offer 2 courses each calendar year, with varying locations to accommodate the entire state. Currently the course is open only to existing staff of the core workforce system (Division, Workforce Boards, service contractors) who are actively supervising others. The course will begin to include aspiring managers once most of the current managers have participated.
8. Another new initiative designed to enhance accessibility to training and increase awareness of professional development opportunities is the *NCWorks Training Champions*. Each Workforce Board was given the opportunity, in collaboration with Division leadership, to identify staff of the NCWorks Career Centers to participate in the training. The training consisted of three sessions over 4 months. Participants were exposed to tools and techniques for designing, training, and team activities, how to access and effectively utilize existing online course options and develop their own skills

as a training advocate. The 28 staff who graduated are actively encouraging staff development in their local areas, supporting their peers in professional growth, and providing the Training Center with accurate and tangible information on local training needs and preferences.

Business Engagement and Sector Partnerships

North Carolina will proactively address the changing needs of the economy for an employer-driven system by strengthening and expanding sector partnerships and business engagement strategies. Below are specific strategies identified to ensure a stronger connection to the business community and to ensure that the workforce system is meeting the needs of the economy.

- Support local and regional sector partnership initiatives identified by Governor's State Council for Sector Strategies where employer leadership drives strategies and partner activities.
- Ensure alignment of sector partnerships to local and regional priority and in-demand industries for outcomes toward growth and economic impact.

Currently, NextGen Sector Partnership National Model facilitation and training is a primary example of a sector strategy initiative throughout the state. This initiative is employer-driven and promotes partnerships among local businesses and workforce development entities, with employers driving the action.

- Key leaders from the North Carolina Community College System Office, the NC Department of Commerce, The Economic Development Partnership of North Carolina (EDPNC), the NCWorks Commission, the Cumberland County Workforce Development Board, and the Governor's Office (all comprising the North Carolina State Sector Strategy Council), have come together to clarify a state mission and strategy for supporting collaborative business engagement through industry-led sector partnerships.
- The 23 North Carolina Local Workforce Development Boards are also in a unique position to lead business engagement strategies in their local communities. Diversity among partner agencies is important, and all agencies, business entities and associations engaged in economic and workforce development are working to collaborate to fully understand business needs and efficiently deliver the right services to address those needs through sector strategy models.
- The North Carolina State Sector Strategy Council selected three local areas to receive a two-day training session this year and each region held public partner meetings and identified employer champions.
- Three regions have been awarded with technical assistance from the Next Generation Sector Partnership to launch sector partnerships: an advanced manufacturing partnership in both the Western and Northern Piedmont Regions, and a biopharma partnership in the Central region.

Career Pathways

North Carolina implemented a strong career pathway strategy in place that expanded on the work done over the last decade by the K-12 and community college systems. Local area workforce boards continue to promote activities that support Career Pathways for critical industry clusters and those that create new career pathways are recognized by the NCWorks Commission. Pathways include multiple entry and exit points, so all people can use the pathway to plan their career. North Carolina's career pathways strategy is undergoing an analysis to revise the training on how to use career pathways to advise and support all individuals.

- Increase, strengthen, and promote work-based learning activities, including investigating how they could be incorporated into agreements with companies receiving state economic development

incentives; as well as how teachers and instructors can integrate work-based learning into their curriculum programs.

- Increase support for registered apprenticeships with pre-apprenticeships to develop a full-service program that reaches all industry sector and all communities.

North Carolina continues to focus on providing career pathways to our citizens. These pathways align with the skill needs of industries in the economy of North Carolina and prepares our citizens to be successful in a full range of educational options by providing education, training, and other services to meet the needs of the individual. The certified pathways previously implemented resulted in 36 certified pathways across the state from 2016-2019.

Work- based learning is a key element in career pathways and other work. North Carolina is continuing to go through analysis measures to identify opportunities to foster the alignment of economic and workforce development, including cross-training workforce partners to increase and promote work-based learning across the state. Two examples of successful measures are the continued allocations of resources (by DWS) to support a work-based learning focused position in all local areas which is tied to goals and performance metrics, and the incorporation of all work-based learning and training activities to economic development projects where companies are seeking state or local economic incentives. There are a variety of types of work-based learning in which a business could engage including internships for students, externships for educators, co- ops, and apprenticeships. Businesses would benefit from these programs by helping to develop the future talent they need to maintain or grow their business. A main goal is to expand the number of NCWorks Certified Work-Ready Communities to demonstrate to businesses that communities have the workforce needed.

The NC Work Ready Communities initiative is a partnership between the NC Work Ready Certified Communities State team and the ACT Work Ready Communities team to support economic development throughout the state by providing counties with a framework to validate that they have a skilled workforce ready to fill current and future jobs. An on-going goal of this initiative is to expand the number of NC Work-Ready Communities to demonstrate to businesses that communities have the workforce needed. The availability of a skilled and ready workforce drives economic development activities throughout North Carolina. The Certified Work-Ready Community certification demonstrates the employability of a local workforce, which strengthens the important connection with economic development. This initiative rewards the many workforce partners and local employers who have committed to improving the skill level of its workforce and achieves high standards of workforce quality. As of January 2020, sixty-seven counties participate in this initiative.

Other initiatives related to these career pathway efforts include:

- Workforce development partners will use sector partnerships and career pathways to prepare workers to succeed by gaining the skills and experience needed for in-demand occupations.
- NCWorks Career Pathways are developed to focus on local and regional in-demand occupations in collaboration with local educational institutions and partners. Education and workforce development partners will continue to target their resources on career awareness and increasing enrollment in career pathways.
- As resources and budgets tighten, targeting resources toward helping people enroll in career pathways for high-demand occupations will help the workforce system be more efficient with its resources; individuals will gain access to high-demand occupations and improve their quality of life; and businesses have the workforce they need to be successful and grow.
- Connect Title II Adult Education, College and Career Readiness programs by creating multiple entry points to ensure access for underserved populations.
- NC College and Career Readiness will collaborate with core partners and NC community colleges to support the development of pre-apprenticeships linked to registered apprenticeships to target

adults who have barriers to employment. State Leadership funds will be used to coordinate with core providers to establish a student referral system, cross-training, and integrated service delivery system.

- The Community College System will coordinate workforce development strategies to support on-ramp programming to include Integrated Employment and Training, workforce preparation, career advising, and apprentices and transition services.
- Title II will work with Career and Technical Education to provide training on developing key elements for career pathways to include contextualized instruction for targeted industries, and programming that targets the needs of serving individuals with disabilities and English language learners.
- Continue to support the implementation of NCcareers.org, a career information portal that ensures students and jobs seekers have reliable information on career opportunities and educational programs to prepare for those opportunities.
- An interagency working group of partners is reviewing and assessing the revamping of nccareers.org and make recommendations for the portal. This web portal will be a hub where students and job seekers can turn to find relevant and accurate career information. This hub will not replace available career information but provide appropriate navigation to the best resources.
- Support collaborative efforts under the vocational rehabilitation program to provide individuals with disabilities the rehabilitative services, training, and supports needed to obtain or maintain employment, including utilization of career pathways, pre-apprenticeships, apprenticeships, and community-based work experiences (internships and on the job training) whenever available and whenever these venues are well-matched with the skills, interests and abilities of its program consumers.
- The vocational rehabilitation programs will continue to incorporate, to the maximum extent possible, career pathways and jobs with the potential to lead to career advancement within their services to individuals with disabilities through approaches to include increased emphasis and on reference to career pathways during comprehensive assessment of individuals' skills, interests and aptitudes and during counseling and guidance sessions with individuals.
- Program leadership will promote to staff and service recipients the use of established resources highlighting information about career pathways and in-demand occupations; increase emphasis on established career pathways and career growth when developing employment goals and individualized plans for employment with services and training that directly support the employment objectives; remain actively engaged with workforce partners in the collaborative development of career pathways and identify particular issues or challenges individuals with disabilities may encounter when adopting a career within an established career pathway or enhancements that may be particularly favorable for the populations served by the state's vocational rehabilitation programs.
- Individually and collaboratively address the unique needs of current and prospective customers, including community college students, youth, individuals with barriers to employment, veterans, and other populations to help them succeed in education and careers.

Career pathways provide a consistent plan for individuals to use. Pathways are designed to allow individuals multiple entry and exit points as well as crediting students for earned credentials, prior learning, and established job skills.

Use Data to Drive Strategies and Ensure Accountability

From using data-driven decision making to improve workforce programs, to providing performance dashboards to stakeholders, system accountability is wide-ranging and imperative to North Carolina's workforce development's future. North Carolina's system will be accountable to the public for providing high-quality workforce development services in the following ways:

- Continue the process of interfacing NCWorks Online with North Carolina's array of workforce development case management systems.
- There are several case management systems in North Carolina that are used by workforce development programs to track services provided to participants that could include tuition reimbursement amounts, referrals to other agencies, counseling notes, etc. These case management systems are required for data collection and federal reporting. Currently, there is no integration or interface between these systems, requiring extra work on the part of customers and staff. For example, as customers access the workforce system through different agencies, they are required to resubmit eligibility and/or demographic information, which is time consuming and redundant. During the past plan, initial exploration of methods addressing this limitation did occur, but the progress had been impeded because some of the partners were in the process of replacing their current case management systems. This is a lengthy process. Progress has been made and funding commitments toward this alignment in that the North Carolina SNAP Employment & Training Program (FNS E&T) has recently contracted with Geographic Solutions to build a module so their case management system (NC FAST) can actively communicate with NCWorks.gov. Additionally, in October 2019, Title IV Vocational Rehabilitation Services Programs (DVRS and DSB) has committed to funding through a contract with Geographic Solutions for developing their case management system. This has the potential of dramatically improving alignment of data systems, as Geographic Solutions is the current developer for the North Carolina Department of Commerce, Division of Workforce Solutions (DWS) NCWorks.gov case management system for WIOA Title I & III.
- The Division of Information Technology (IT) department is currently in the process of partnering with other agencies to work on improved system integration.
- Develop an annual workforce development system report card with universal success metrics.
    - While each workforce development program typically has multiple performance measures, many of them mandated by the U.S. Departments of Education, Health and Human Services, and Labor, universal success metrics give North Carolina customers a consistent look at the results of the workforce system. These results will be displayed via a report card and provide a common framework to measure our workforce system's progress across a wide variety of programs. This dashboard will be easy to access and understand, and will highlight the employment, wage, and training results for each workforce development program.
    - The NCWorks Commission has established a set of core performance measures for all workforce programs in the state and reports on these measures annually. Measures look at employment and educational enrollment status of former participants across programs.
- Create metrics based on consistently collected feedback from customers to strengthen the workforce development system.
    - Historically, each workforce development agency has been responsible for measuring the overall satisfaction of its clients. Measuring this level of satisfaction is program specific and lacks consistency. An integrated workforce development system requires universal customer satisfaction metrics based on a consistent feedback loop. The analysis of the feedback will be used to strengthen North Carolina's workforce development system.
    - NCWorks contracted with a research evaluation group to develop, distribute, and analyze customer feedback across the state. In addition, the biennial Employer Needs Survey conducted by the Labor & Economic Analysis Division (LEAD) collects workforce development system feedback from over 2,000 business establishments about their hiring practices, hiring difficulties and workforce needs.
    - The workforce development system must be continuously responsive to its customers. The NCWorks Commission will continue to work with workforce development agencies to establish a continuous improvement process that canvases all customers regardless of

access point, seeks to understand their challenges, and provides a mechanism for strengthening the system.

- Pilot consumer reporting that provides industry-recognized credentials to better assess the outcomes of those individuals in the workforce.
    - As industry certifications become more prevalent in the labor market, it is important for educational institutions to establish data-sharing relationships with certifying bodies and for state agencies that manage wage and occupation data to ensure their training programs are well aligned with industry and professional standards. There are challenges impacting the effectiveness of direct collaboration between these groups including legal issues and security of data. Educational institutions often do not have access to certification exam data, which limits their ability to know if students are leaving their programs well prepared to meet industry-specified competencies.
- Finalize state performance measures for local workforce boards.
    - As per the Workforce Innovation and Opportunity Act (WIOA) section 116 and NC General Statute 143B-438.10, the NCWorks Commission is responsible for developing performance accountability measures for Local Workforce Development Boards. The commission reviewed baseline information in the spring of 2016 and developed performance measures beginning in program year 2016. These measures will ensure that local boards are fully implementing programs to meet the goals of the commission and WIOA.
    - The NCWorks Commission developed these measures in consultation with the Local Workforce Development Boards Directors and chairs to complement the WIOA federal primary indicators of performance for adult and youth training and employment. Local Workforce Development Boards and the NCWorks Commission work together to collect performance data in three main areas: Outreach & Engagement, Skills Gap, and Process measures.
    - These nine measures for local board performance reveal trends in outreach and engagement with individuals and businesses, training for adults and youth, and career center and career pathway certifications.
    - New targets that were approved by the commission in February 2018 are now effective as of July 1, 2018.

NCWorks Commission Local Workforce Development Board Performance Measures

Outreach & Engagement

1.Provide staff-assisted services to a percentage of the labor force that is equal to or larger than the annual unemployment rate for the Local Workforce Development Boards (WDB) Area.**

2.Provide a staff-assisted service to at least 5% of all private businesses in the counties served by the local WDB.

3.At least 10% of all private businesses receiving staff-assisted services will be new customers.

4.At least 25% of all private businesses receiving staff-assisted services will be small businesses (<100 employees).

Skills Gap

5.Provide training (classroom, on-the-job, and/or standardized training) services to at least 5% of adult participants.**

6.Enroll at least 25% of youth served in the WIOA Youth program in a work-based learning activity.

Process

7.Each WDB will engage in the creation of at least two NCWorks Certified Career Pathways. Evaluations will be tracked.

8.100% of the local WDBs' career centers will be NCWorks Commission certified career centers. Certifications will be tracked.

**Includes Adults, Dislocated Workers, and Title III participants

Alignment with Activities Outside the Plan.

Describe how the activities identified in (A) will be aligned with programs and activities provided by required one-stop partners and other optional one-stop partners and activities provided under employment, training (including Registered Apprenticeships), education (including career and technical education), human services and other programs not covered by the plan, as appropriate, assuring coordination of, and avoiding duplication among these activities.

The activities listed in Section A above, developed by the NCWorks Commission, were planned for the entire workforce development system under the Commission's strategic plan. The NCWorks Commission's strategic plan provides the framework for all workforce programs in North Carolina, including but not limited to the programs covered under WIOA. These programs, in addition to the core programs of the Unified State Plan, include Registered Apprenticeship (ApprenticeshipNC), career and technical education offered at both the K-12 and community college levels, programs offered by the NC Department of Health and Human Services, including Temporary Assistance to Needy Families (TANF)/Work First and SNAP/Food and Nutrition Services, and other programs offered by the NC Community College System, and the NC Department of Commerce.

The NCWorks Commission includes representatives from the business community, heads of state workforce agencies, educators, and community leaders who work together to align our core workforce programs and activities at the state-level. Efforts include extensive stakeholder work and programmatic reviews of program plans, policies, and services across agencies.

The programs under review include the American Indian Workforce Development Program administered by the NC Department of Administration; the Title I adult and youth programs, Wagner-Peyser, Trade Adjustment Assistance, and Veterans' Program, administered by the NC Department of Commerce; the Registered Apprenticeship Program, Bionetwork, Customized Training, Small Business Center Network, Adult Education and Basic Skills, Occupational Continuing Education, and Postsecondary Career Technical and Vocational Education programs administered by the NC Community College System; the Career and Technical Education program administered by the NC Department of Public Instruction; and the Temporary Assistance to Needy Families (TANF)/Work First, Snap/Food and Nutrition Services, Community Services Block Grant; Senior Community Service Employment, and the Vocational Rehabilitation and VR Services for the Blind programs administered by the NC Department of Health and Human Services.

These programs are evaluated regarding funding and service capacity, number of counties served, types of services provided, and target populations. In the most recent review, the Commission found that most programs offered some type of skill development and employment services for adults, but few programs served youth. Several programs provide similar services like resume development, career counseling, and skill development; however, while these activities seem duplicative with regard to the type of service provided, the programs serve very different target populations, and programs have specialized services for meeting the needs of their customers such as specialists trained to serve individuals with disabilities. The need to strengthen services to employers, quality customer service, the skills gap, business outreach, and services to youth identified in the evaluation are addressed throughout the WIOA Unified Plan.

The North Carolina Community College System and the local 58 community colleges work collaboratively with Local Workforce Development Boards on specific industry initiatives to raise the awareness of career opportunities, education and training opportunities, as well as work-based learning opportunities in all communities across North Carolina. Through these partnerships faculty spend time in industry and take what's learned in these field experiences back to the classroom. Activities such as manufacturing career awareness week, construction careers awareness day and the monthly career pathway webinars sponsored by CTE Perkins at the community colleges raise the awareness of emerging careers as well as in-demand job opportunities across the state. Career fairs and job fairs bring employers and students face to face to share opportunities, and in many cases current students are offered opportunities for work-based learning and are hired for jobs in their community. These activities are planned, coordinated, and carried out in cooperation with Community Colleges and high school career and technical education programs, with local chambers of commerce and workforce boards.

In addition to the career awareness, career planning, and education and training programs offered by high schools and colleges, Career and Technical Education Programs at community colleges work together with WIOA to offer opportunities for paid on-the-job training, supportive services such as finish line grants, and shared career counseling. Emphasis on postsecondary credentials such as the accountability measure in Perkins V and the goal of Postsecondary credentials in myFutureNC provide the framework for future collaboration.

Other strategic planning efforts related to workforce development, including those of the Education Cabinet, Community College System, the University of North Carolina Board of Governors, State Board of Education and myFutureNC are consistent with those of the Commission. Efforts to coordinate and align strategic plans, goals, and performance measures with the North Carolina Unified Plan are made through interagency workgroups and stakeholder participation.

Vocational Rehabilitation (VR) programs maintain working partnerships with non-profit organizations as providers of rehabilitation services. The community rehabilitation programs provide services through contracts and memoranda of agreement and have representation on a state-level steering committee. The VR programs also have cooperative agreements, policies, and procedures for coordination, referrals, information sharing, and the provision of support services with other programs such as through the NC Department of Health and Human Services, Division of Services for Deaf and Hard of Hearing and Division of Mental Health, Developmental Disabilities, and Substance Abuse Services. The VR programs also partner with local education agencies to facilitate the transition of students with disabilities from school to the receipt of VR services.

Another alignment strategy of the state is through data sharing agreements across workforce agencies and the expansion of the North Carolina Common Follow-up System (CFS), a longitudinal tracking system. Data agreements across agencies are being developed to enable electronic referrals, including programs outside the plan, such as between the TANF program and Vocational Rehabilitation. The CFS provides information on the educational and employment outcomes of participants in publicly supported educational, employment and training programs, including programs outside of the WIOA unified state plan, such as the University of North Carolina, adult correctional programs, and social services programs. The Labor and Economics Analysis Division of the NC Department of Commerce is currently working with the Government Data Analytics Center within the NC Department of Information Technology to improve access to the State's longitudinal data and provide flexibility and scalability, and advance data analysis capabilities associated with workforce and educational program operation and performance. Information from the CFS, including cross-program participation, is used in planning, policymaking, program evaluation, resource allocation and career planning.

Coordination, Alignment and Provision of Services to Individuals

Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan and required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services to individuals including those populations identified in section II(a)(1)(B). The activities described shall conform to the statutory requirements of each program.

As a system, NCWorks will pursue strategies to ensure job seekers have access to all services across programs. The NCWorks Commission continues the coordination and alignment of programs to create an integrated workforce system that allows all customers to access timely and relevant services.

The NCWorks Commission has established several key mechanisms to strengthen how programs are coordinated. Currently Titles I and III are integrated and there is a formalized referral process with programs offered through Title IV. To complete the coordination, Title II will be included in the formal mechanisms and or a standardized formal referral process will be developed in the next year to integrate Title II. The formal mechanisms listed below continue to be used to improve coordination between all WIOA programs, including Title II.

First, the WIOA State Steering Council was established in 2015 to bring together the senior leadership of each program covered under WIOA to review current activities, discuss solutions, and track implementation. This council will review progress on WIOA implementation and develop strategies for improvement and review state policies that may inhibit programs from fully aligning activities. The council will implement strategies for better alignment such as creating a common intake form, exploring the possibility of an integrated case management system, and strengthening the referral process between programs. The council will provide feedback to the NCWorks Commission regarding challenges and barriers to completing the work, and suggestions for new policy.

Second, local and regional teams will facilitate coordination, collaboration, and alignment at the local level. State-level coordination and alignment provides the framework, structure, and support for an integrated workforce development system, but it's local and regional activities that must truly be aligned to improve the system. These councils report to the WIOA State Steering Committee on best practices as well as barriers to success.

Third, North Carolina is in the process of rolling out the new NCWorks logo and brand to assist in creating a seamless workforce development system that is easily identifiable to all customers, with a priority of service to those jobseekers who are Veterans, recipients of public assistance, low-income individuals, and jobseekers who are basic skills deficient. Job seekers will find value in North Carolina's workforce development system when the overwhelming complexity is minimized, and services streamlined. The common brand reduces confusion for those unfamiliar with the system by simplifying the message and increasing the efficiency of statewide outreach.

Fourth, NCWorks partners will continue to implement and expand its system-wide outreach strategy. A consistent outreach strategy allows for customization at the local level. A key activity to achieve this consistent outreach strategy is cross-training of staff. The NCWorks Training Center provides cross-training, so that staff have basic knowledge of all the workforce programs in the state.

Finally, the NCWorks Commission will review the implementation and effectiveness of WIOA, NCWorks Career Centers, and overall performance of the system. The Governance and System Alignment committee reports to the full commission on successes and challenges of the system and recommends key policy changes to the Governor, NC General Assembly, and other state and local leaders.

In addition to the strategies put in place by the NCWorks Commission, the three agencies responsible for implementation of WIOA have key activities in place to ensure a well-coordinated, customer-focused, and high-quality system is in place. For example, per federal requirements, during the most recent Title II grant

application planning process involving local Adult Education providers, NCCCS collaborated with the local workforce boards via the Director's Council, and the local workforce boards included the goals of Adult Education in their WIOA Annual Plans. Another example would be the Finish Line Grants, a collaboration between Department of Commerce, Local Workforce Development Boards, and the NC Community College System, initiated by the Governor's Office. These grants provide emergency supportive services to students in financial need, so they can complete their credentials or degree.

NCWorks Career Center System

NCWorks Career Center (one-stop) system has fully integrated services provided through Titles I and III. North Carolina's focus for this system is on achieving a culture of quality customer service. The career center system is established to provide improved performance, coordinated access to services, and service delivery accountability. These centers serve as the front-line touch points for the state's job seekers. The WIOA State Steering Council is currently working to develop key strategies for integrating Titles II and Title IV, in addition to other workforce programs.

Below is a description of how integrated career centers operate and plans for integrating the remaining WIOA programs:

To ensure a customer-focused career center system, the NC Department of Commerce Division of Workforce Solutions implemented a state-wide, integrated services delivery approach to better serve the state's citizens and businesses by responding to customer needs. Integrated services delivery focuses on customer service and is organized around services to customers, not discrete programs offered in silos. In North Carolina, it is a system in which Workforce Innovation and Opportunity Act Title I (Adult and Dislocated Worker) programs and Title III (Wagner-Peyser Employment Services) are the operational backbone of NCWorks Career Centers.

Career centers deploy integrated staffing and use integrated technology to generate an integrated customer pool and customer flow. Staff are organized by function and are cross-trained so that all center staff has the capacity to serve all customers and is knowledgeable about all services the center offers. In addition, staff use a single, web-based system (NCWorks Online) that provides job matching services to job seekers and employers, as well as program and client management/participant tracking used by staff. Customers (when eligibility permits) are enrolled in both WIOA Title I Adult program and Wagner-Peyser program; and all Trade Adjustment Act customers are enrolled in WIOA Title I Dislocated Worker program. This model emphasizes cross-training of staff and strong partnership to serve customers better.

The NCWorks Commission was charged with setting new criteria and standards for quality customer service for the state-wide career center system. These criteria includes elements to ensure high-quality customer service, integrated services delivery, accessibility, and consistent program offerings to ensure a consistent level of quality customer service throughout the state's workforce delivery system.

In addition, many centers are co-located with community colleges or county social services and have vocational rehabilitation staff who work on-site. In addition, a strong partnership and referral process is in place for all workforce development programs offered by the state and local communities.

Plans for Integration of All WIOA Programs

In addition to the integration of programs offered through Titles I and III through NCWorks Career Centers, there is also a strong relationship between career centers and the programs offered through Title II, Title IV, and other programs.

Title II Adult Education and Family Literacy Act

Title II, Adult Education and Family Literacy Act, providers must align their program plans to those of the Local Workforce Development Boards. To ensure services are aligned, Title II operates a competitive Request for Proposal process that includes local Boards to review and comment on the extent of a

proposal's alignment to the local plan. In addition, Title II providers share in infrastructure costs based on propionate use by Title II students. Through MOUs Title II providers negotiate roles and responsibilities for integrated services.

The focus of Title II is providing academic preparation and workforce preparation skills and knowledge for credential attainment. Title II providers will collaborate with their local NCWorks Career Centers to ensure adults receive comprehensive services to support credential attainment and employment through the following strategies:

- Establish a Core Partner One-Stop committee to meet annually and report to NCWorks Commission on priority of services and clearly defined processes for seamless delivery of services.
- Establish a standard MOU process and timeline to include all core partners.
- Revise the MOU to include a clear process for outlining core partner delivery of Career Services, access to core partner services and referral.
- Title II providers will participate as a member of the Local Workforce Development Board and committees to plan integrated services, coordinate core partner responsibilities, and negotiate services and delivery systems provided at NCWorks Career Centers. Each Title II provider must enter into a Memorandum of Understanding outlining access to services and training vouchers for Title II students.
- Assist in the development and participate in cross-functional training about staff roles, responsibilities, and available resources.
- Establish processes to include Title II students in recruitment and job placement with employers.
- Develop and implement models such as Integrated Education and Training and Pre-apprenticeships linked to Registered Apprenticeships.
- Create common referral system to provide universal access to placement and training services and to integrate programs by offering a common core of information and services which will ensure seamless and more efficient service delivery and cross-agency collaboration.

Vocational Rehabilitation Programs

The Divisions of Vocational Rehabilitation Services and Services for the Blind have strong ties with other components of the statewide workforce development system. The partnerships and linkages that were established prior to the enactment of Workforce Innovation and Opportunity Act of 2014 have served as a stable and effective foundation for effective service delivery. Cooperative agreements or memorandum of agreements have been established with all local area workforce boards. The agreements provide for the following strategies:

- Provision of inter-component staff training and technical assistance with regard to the availability and benefits of, and information on eligibility standards for vocational rehabilitation services; and the promotion of equal, effective, and meaningful participation by individuals with disabilities receiving workforce development system services in all of the states NCWorks Career Centers in the state through the promotion of accessibility; the use of non-discriminatory policies and procedures; the provision of reasonable accommodations; auxiliary aids and services, and rehabilitation technology for persons with disabilities.
- Identification of service delivery strategies by the division within the NCWorks Career Centers and other components of the workforce development system.
- Development and implementation of information systems that link all components of the statewide workforce development system; that link the components to other electronic networks including non-visual electronic networks; and that relate to such subjects as employment statistics and information on job vacancies, career planning, and workforce development activities.

- Further development and use of customer service features such as common intake and referral procedures when feasible, customer databases, resource information, and human services hotlines.
- Establishment of cooperative efforts with employers to facilitate job placement and carry out any other activities that Vocational Rehabilitation and the employers determine to be appropriate.
- Identification of staff roles, responsibilities, and available resources, along with specification of the financial responsibility of each component of the statewide workforce development system with regards to paying for certain services (consistent with state law and federal requirements).

The rehabilitation needs of individuals who are served through components of the statewide workforce development system other than through the public vocational rehabilitation program is assessed through the methodology outlined in the respective sections of the VR portions of the NC Unified State Plan. One of the ongoing goals for both the vocational rehabilitation and NCWorks system is to continue to refine the processes and procedures for NCWorks Career Center staff to better determine which consumers with disabilities utilizing the centers should be referred to DVRS or DSB rather than being served through NCWorks. It is necessary to determine which consumers served by the NCWorks system have a disability. Strategies to improve this will be further explored via mutual collaboration between VR and NCWorks Career Centers to establish training for its staff.

The Vocational Rehabilitation programs enthusiastically participated in the development of NCWorks Career Centers and continues to be an active partner throughout North Carolina to ensure that persons with disabilities are able to access core workforce services. Vocational Rehabilitation staff are represented on the state level as well as on local boards. The VR programs remain an active partner with the workforce development system and supports the NCWorks concept to provide more universal access to placement and training services; to integrate programs by offering a common core of information and services; and by offering consumers more choices regarding where and how they get services. Through local agreements, direct service delivery staff within the Title IV divisions have gained more access to comprehensive data, which enables faster service delivery and cross-agency collaboration. Nearly all Vocational Rehabilitation program offices have obtained access to these databases to date.

In every community where there are NCWorks Career Centers, local DVRS and DSB offices provide vocational rehabilitation counseling staff, vocational evaluators, community employment program specialists and other staff as appropriate to meet the needs of those individuals who enter an NCWorks Career Center and require the specialized services offered by the VR programs. Specific arrangements and staffing patterns by vocational rehabilitation program staff at NCWorks Career Centers vary across the state, depending on local needs and agreements. One of the ongoing goals for the vocational rehabilitation and NCWorks system is to continue to refine the processes and procedures for NCWorks Career Center staff to better determine which consumers with disabilities utilizing the centers should be referred to DVRS or DSB rather than being served through NCWorks. It is necessary to determine which consumers served by the NCWorks system have a disability and to be able to make referrals electronically. Strategies to develop an electronic referral system will be further developed through mutual collaboration between DVRS, DSB and NCWorks. DVRS and DSB will also provide disability-related trainings for NCWorks Career Center staff and any employer who can benefit.

The number of individuals served or identified through components of the workforce development system is increasing. Local VR office management represents Vocational Rehabilitation on the Local Workforce Development Boards while staff also actively participate in planning, development, and service delivery with both individual component agencies or within the NCWorks Career Centers already established.

Enhanced working relationships and communication with other key partners of the workforce development system such as the NC Division of Social Services, NC Community College System, regional economic development partners, and other local partnerships allow all the agencies to better meet the needs of the individual. Other efforts to provide comprehensive, high-quality, customer-centered services, including supportive services to individuals, will also be conducted through (a) cooperative agreements

with agencies not carrying out activities under the statewide workforce development system for the purpose of information and resource sharing and referrals; (b) coordination with education agencies, such as the Department of Public Instruction, NC Community College System, University of North Carolina System, and local education agencies for the provision of training and transition services to youth with disabilities, including pre- employment transition services; (c) cooperative agreements and contracts with private nonprofit vocational rehabilitation service providers for the provision of rehabilitation training with short- and long-term supports; (d) arrangements and cooperative agreements for the provision of supported employment services with the NC Division of Mental Health, Developmental Disabilities, and Substance Abuse Services to ensure that individuals with the most significant disabilities have equal access to VR and best practice employment services; and (e) coordination with employers to identify competitive integrated employment and career exploration opportunities to facilitate VR services and the provision of transition services, including pre-employment transition services, for students and youth with disabilities.

The Unified Plan process provides for an opportunity to bring together Adult Education/Literacy and Workforce Innovation and Opportunities Act Youth programming in new ways.

Coordination, Alignment and Provision of Services to Employers

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

North Carolina's workforce development system is committed to the provision of comprehensive, high quality services to employers that help to meet the current and projected workforce needs and achieve the goals of industry and sector partners throughout the state. The three agencies with administrative responsibility for the WIOA core programs work together via local, regional, and state-level teams and initiatives focused on meeting the needs of businesses and industry in North Carolina. An interagency NCWorks team facilitates the integration of employer services through several coordinated efforts including: the development of comprehensive employer service informational brochures and literature that are dissemination for use across all WIOA programs; working with a vendor to implement a new integrated customer relationship management tool, and establishing area business services teams to ensure coordination among Local Workforce Development Boards and other partners including community colleges, public schools and vocational rehabilitation. Further, the State will recommend a business services committee be established by Local Workforce Development Boards that will develop local and regional strategies for employer engagement and report to the boards quarterly.

North Carolina's employer service efforts are focused around the three key Workforce Innovation and Opportunity Act concepts of (1) regionalism as an approach to engage businesses, (2) creating collaborative partnerships with economic development/education to provide solutions, and (3) developing sector strategies to build talent pipelines.

Through collaborative efforts, North Carolina's Local Workforce Areas are pursuing a regional approach, and establishing a framework to enhance business engagement with the Workforce System. The framework provides a foundation to support the work of local teams which will work to ensure consistent delivery of services to businesses across the state and to create a comprehensive approach for forging collaborative partnerships with key stakeholders. Local teams will be comprised of business services staff from workforce programs in the area including WIOA core programs as well as other workforce development partner programs. These efforts will focus on business engagement and outreach, developing comprehensive solutions (across programs when applicable), and satisfying the workforce talent needs of businesses and industry sector partners.

The following overarching goals are essential to these efforts:

- businesses are targeted proactively and strategically based on sector analysis and in alignment with local board strategic plans;
- employers are offered a single point-of-contact throughout the relationship to ensure relationships are maintained;
- comprehensive solutions are provided to address business needs throughout the entire business life cycle; and
- technology is leveraged to facilitate information sharing and collaboration.

For business services to work well as a collaborative, and deliver excellent customer service, each local area will identify and position Business Service Representatives to lead their regional efforts to meet business needs.

In addition to these efforts, North Carolina has several other key strategies that help to engage employers, assist with their workforce needs and contribute to broader economic development activities. Local teams will use the strategies below alone or in combination when working with businesses. Below is a summary of the state's employer services strategies and activities.

NCWorks Career Centers

NCWorks Career Centers help employers find, train, and retain qualified employees. Each center provides services to help local businesses, including the following:

- job applicant screening and qualified candidate referrals;
- valuable and up-to-date labor market facts and projections, such as wages;
- information on tax credits for hiring particular groups of workers;
- space to conduct job interviews;
- help arranging job fairs;
- workshops on employer-related subjects;
- employee training resources;
- layoff/closure prevention services for employers; and
- information about federal bonding (insurance for hiring at-risk workers.)

NCWorks Online, North Carolina's web-based job matching system, provides the mechanism for businesses to post jobs, get real- time analysis on the labor market, find qualified candidates to fill open positions, and all at no cost to employers.

NC Department of Commerce Division of Workforce Solutions On-the-Job Training

The North Carolina Department of Commerce Division of Workforce Solutions provides the resources and guidance to the 23 Local Workforce Development Boards to implement successful work-based learning and on-the-job training (OJT), which provides North Carolina a means to expand and enhance workforce service delivery to the State's citizens. OJT is a viable pathway for unemployed workers seeking employment and for employers seeking workers. It offers the unique opportunity to offset initial training costs to fill skilled positions while building organizational productivity as the employee learns job requirements. An OJT arrangement can be the impetus for an employer to create a job opportunity. Local

Workforce Development Boards consider OJT placements in the context of in-demand occupations or industries where career pathways exist with employer partners who have a documented plan to add jobs.

OJT is a viable and compatible part of North Carolina's Integrated Services Delivery services. Local Workforce Development Boards OJT policy is critical for consistency, institutionalizing services the local board seeks to deliver, and managing and leveraging OJT funds. Local OJT policy also provides guidance on how to comply with federal and state OJT requirements and leverage other hiring.

Work Opportunity Tax Credits

The Work Opportunity Tax Credit encourages employers to hire individuals who are qualified for open positions but face barriers to employment. Businesses can receive a onetime tax credit of $2,400-$9,600 for hiring a qualified job applicant; the amount varies, depending on the hire.

To be eligible for the tax credit, employers must hire an individual from one of the following groups:

- recipients of Temporary Aid to Needy Families (TANF) or the Supplemental Nutrition Assistance Program (SNAP);
- former offenders;
- vocational rehabilitation program participant;
- recipients of long-term family assistance;
- veterans unemployed at least four weeks; and
- veterans with a service-connected disability

In North Carolina, the NC Division of Workforce Solutions accepts applications for the tax credit, which is authorized by the U.S. Congress.

North Carolina Community Colleges Services to Employers

The North Carolina Community College System is a system of 58 comprehensive community colleges that melded the collection and missions of the state's public junior colleges and its public Industrial Education Centers in the 1960s. The system provides a diverse set of education and training programs as well as an array of services to the state's business and industries. The system is nationally known for its educational and training programs including the nation's first and most robust Customized Training programs.

The NCCCS is known for its comprehensive and diverse program offerings. These include the administration and provision of High School Equivalency exams and adult education. The NCCCS also has administrative responsibility for the WIOA Title II Adult Education and Literacy programs and many of the local community colleges are the main training partners of WIOA Title II programs. Additionally, NCCCS Basic Skills Plus, a tuition waiver program supports adult education students enrolled in career pathways leading to a high demand industry credential.

North Carolina's Community Colleges also play a major role as a network of Eligible Training Providers, with all colleges sponsoring job training or curriculum programs which are approved for WIOA customers. I addition, there are 11 certified comprehensive NCWorks Career Centers that are located on a community college campus, and additional community college locations are used as outposts to comprehensive centers located off-site. These efforts as well as additional linkages between community colleges and NCWorks Career Centers make program collaboration and cross-referral easier.

The North Carolina Community College System has a long-standing history of serving employers through a variety of efforts. These include North Carolina's registered Apprenticeship program-ApprenticeshipNC, Customized Training Programs, Business Advisory Committees, Sector Strategies, Customized Training and Small Business Centers.

In addition the North Carolina Community College System's current strategic plan, *Putting Education to Work*, has a major emphasis on employer services through its goal of "Economic and Workforce Impact," and the goal seeks to meet employer needs through a collaborative approach including other workforce partners.

Registered Apprenticeship

North Carolina's registered apprenticeship program ApprenticeshipNC is administered by the North Carolina Community College System (NCCCS). The program was transferred to the NCCCS in October 2017. Participating employers work with ApprenticeshipNC to create a written agreement that specifies the length of a participant's training, the related technical instruction, and outline of the skills that each participant will need to learn as well as the wages that he or she will earn. Through participation in the ApprenticeshipNC employers gain:

- a proven process for imparting the knowledge and skills of experienced personnel to new employees; greater workforce competency and productivity; partnerships with certification and licensing agencies; credentials that are recognized both in North Carolina and nationwide; and;
- valuable assets in the recruitment and retention of a highly qualified workforce.
  Per federal and state guidelines, Registered Apprenticeship requires education/training, supervised/mentor-based work-based learning, and a progressive wage scale.

North Carolina's ApprenticeshipNC program encompasses registered apprenticeship programs as well as Pre-Apprenticeships and Youth Apprenticeships in its broader portfolio for work-based learning opportunities. Pre-apprenticeships offer greater flexibility to employers while establishing a process for individuals to get "credit" toward a Registered Apprenticeship based on work-based experiences and/or classroom training.

Registered Apprenticeships, youth apprenticeships and pre-apprenticeships involve a great deal of coordination with employers and among workforce development partners, including North Carolina Community College apprenticeship consultants; public schools, and other education providers; and Local Workforce Development Boards as promoters of registered apprenticeship strategies as a part of their overall portfolio of business services.

Key coordination strategies between WIOA core partners and ApprenticeshipNC include upgraded training of existing employees, On-the-Job Training Services, in-school and out of school-youth apprenticeships and pre-apprenticeships. Training sessions will also include sharing information on employers that are searching for new employees to develop Pre-Apprenticeships. The Pre-Apprenticeships will provide pre-employment skills for employers to interview for Youth Apprenticeship and Registered Apprenticeships. WIOA will also pre-screen the pre-apprentices and depending upon eligibility will co-enroll those that are hired by the employer. This will also be an opportunity for braided funding of WIOA and Registered Apprenticeships.

Additional coordinated employer efforts include coordination of WIOA core partners, economic development and ApprenticeshipNC to provide services to several of the state's high demand industries: Advanced Manufacturing, Healthcare, Logistics/Transportation, Energy, Construction, IT and Hospitality. A DOL/OA grant award for expanding registered apprenticeship could assist in this coordination.

Business Advisory Committees

The North Carolina Community College System requires business advisory committees per the Southern Association of Colleges and Schools Commission on Colleges (reinforced through its program review and accountability process), and (where applicable) federal requirements. All technical programs at a community college have program advisory committees which generally meet at a minimum one to two times a year. Many colleges involve deeper involvement; for example, Brunswick Community College works

with an extensive set of economic development and workforce development partners to aggressively seek input on college programming and other workforce services from businesses throughout the county.

In deciding what education, training or certification programs to offer, community colleges rely on a combination of direct input from business (as referenced above), data analyses, and priorities established by economic development partners. Data analysis is generally conducted by college Institutional Research staff (primarily for planning of one- and two year programs), by college Workforce Continuing Education program leaders (for short term training), and/ or procured from the NC Department of Commerce/Labor and Economic Analysis Division or local economic development partners. There is increasing use of supply and demand analyses as well as a variety of economic and labor market data analyses to determine priorities for education/training based on industries that need workers (and thus education/training) and current/projected hiring within specific occupations.

Sector Strategies

North Carolina has a long history in sector strategies using WIA/WIOA funded services, with locally and regionally defined initiatives as well as statewide sector initiatives in areas ranging from Allied Health, Green Energy, Advanced Manufacturing (including specific areas such as Aviation), and many others. Community colleges have played major roles throughout the state and local sector strategies, as leaders or collaborators in initiatives that include WIOA partners.

One notable example of a sector strategy that the Community College System leads is the NC BioNetwork program, funded by the General Assembly. The program has regional centers based at community colleges that specialize in key sectors within biotechnology that are important for North Carolina (e.g., food processing and biopharmaceuticals), and these support the development and provision of community college biotech-related education, training and certification across the state.

Customized Training

One of North Carolina's key workforce tools for economic development is the Customized Training programs offered through the NCCCS. These state-funded community college training offerings are tailored to the needs of employers that are looking to expand, relocate or make new investments in North Carolina.

The NCCCS Customized Training offerings are interwoven into several of the Local Workforce Development Boards and NCWorks career center services. In addition, there are continuing efforts to enhance the connection between Customized Training and other community college education and training services for employers with Local Workforce Development Board services and activities.

Small Business Centers

Every community college in North Carolina has a Small Business Center that provides education, training, and counseling for prospective business owners. These services include training seminars and workshops focused on a variety of topics including: Starting a Business, Writing a Business Plan, Financing, Advertising, Bookkeeping and Marketing. Small Business centers also work with local businesses to develop other workshops and trainings that help to meet their specific needs. In addition, to workshop and training offerings, SBC's provide a variety of counseling and informational resources to clients. Counseling services cover a diverse group of topics including licensing issues, business plans, business feasibility, marketing and advertising, loans and sources of financing and doing business with the government. SBC's also provide other informational, technical and referral resources. These include access to and use of computers, books and other media as well as the provision of information about businesses and industries and referrals to other governmental and business resources.

Vocational Rehabilitation Programs Services to Employers

The Divisions of Vocational Rehabilitation Services (DVRS) and Division of Services for the Blind (DSB) currently utilize a dual customer approach by providing services to both businesses and individuals with

disabilities. These divisions emphasize the definition and marketing of business services to ensure the dual customer approach is recognized and implemented. Business services include recruitment, hiring, consultation on Section 503 compliance, sensitivity/diversity training, accessibility consultation, internships, on-the-job training (OJT), education on tax incentives, follow-up, and job retention services.

DVRS and DSB continue to market business services by employing between the 77 community employment program specialists that serve business communities statewide. These individuals often have education and experience in a business-related field, such as human resources and marketing, so these divisions are equipped with personnel who understand the needs of employers. In addition to providing individualized job seeker services, the community employment program specialists connect with local industry through participation in networking events and working relationships with workforce system partners.

The performance of these community employment program specialists are measured, in part, by assessing relationships with business as evidenced by direct and indirect placements of eligible jobseekers with disabilities. Additionally, as of July, 2019 the tracking of measurable skill gains achieved by consumers served by the community employment program specialists. DVRS and DSB VR programs believe that relationships with employers is the essence of creating positive connections between jobseekers and business, and that providing follow-up and technical assistance to business fosters these relationships so that they can have a sustainable impact on the supporting individuals with disabilities in finding, maintaining, and advancing in employment.

Provision of VR Services through Coordination with Employers

DVRS and DSB VR program services to adults intersect with business services in the areas of vocational evaluation and career development, job seeker preparation, and job development and job placement of individuals with disabilities who are ready to work. VR program staff continue to be trained in the dual customer approach and employment outcomes to identify these intersection points between the VR services provided to jobseekers and those services provided to employers. The unique role of the community employment program specialist highlights this intersection well.

DVRS staff plan to expand the role of employers in vocational evaluation and career development services. DVRS will be enhancing policies around internships and OJT services so that the service procedures are consistent with employer practices while still preparing the individual for competitive employment. DVRS plans to work towards a service definition that is complementary to other internship and OJT programs available in the state through our workforce system partners.

DVRS staff, including business relations representatives, will continue to develop relationships with business based on the individual placement needs of eligible individuals with disabilities who are placement-ready. Employers will be engaged in the individual preparation of job seekers with disabilities by involving them in Employment Marking Skills training classes as well as Job Clubs. Employers participate in job interview preparation of job seekers in addition to information-sharing with job seekers about employer expectations in general and within their specific industry.

The VR programs plan to continue to increase the quantity and improve the quality of business partnerships in the future with the expectation that an increased number and depth in business relationships will result in increased opportunities to assist individuals with disabilities with vocational evaluation and career development, job seeker preparation, and job development and job placement. DVRS and DSB plans to identify methods for capturing information on employment relationships within its shared case management system in order to map out the presence of business partnerships and identify opportunities for growth and means for leveraging peer-to-peer marketing of VR business services.

Provision of Transition Services through Coordination with Employers

While youth and students with disabilities have access to the same VR services as adults, there are some VR services reserved for or targeted to transition-aged youth for the purposes of assisting them with leaving

high school and preparing for competitive employment. The division plans to focus on program development in the coming year in order to meet the 15% required spending allocation for pre-employment transition services to students with disabilities. A number of areas of program development are focused on increased engagement with employers in order to implement pre-employment transition services. These include: summer internships for students and youth with disabilities including on-the-job supports, increased utilization of OJT for students and youth, and increasing the number of Project SEARCH™ sites.

The Vocational Rehabilitation programs of DVRS and DSB plan to enhance its current internship policies to expand the service to a larger group of students with disabilities, including possibly, those who are college-bound or currently enrolled in college training. The goal is to create enriching work experiences for students that expose them to work options, allow them to develop high expectations around their capacity for competitive employment, and build a resume that will enable young people with disabilities to compete for quality jobs. The VR programs plan to also enhance internship opportunities for individuals with disabilities by developing employer-based internship programs with businesses who recognize the value of building up workers. Internship opportunities for youth will be short-term, occur in conjunction with the student's educational requirements or during the student's school breaks, and may involve paid training and engage internship training supports such as job coaching.

DVRS and DSB's VR programs will work on enhancing OJT utilization for students and youth with disabilities as well by engaging business in the development of young talent. The programs continue to streamline its OJT processes, revise policies so that they are complementary to similar OJT programs, and improve marketing and tracking materials and processes so that the materials are engaging to both student/youth participants and potential business as well as easy to complete and accessible.

The Vocational Rehabilitation programs will continue to explore unique business partnerships that benefit the unique training and recruitment needs of students and youth with disabilities, including those with the most significant disabilities. DVRS plans to continue partnering on Project SEARCH™ sites where there is a need and willingness by community partners. This model places business in the middle of the training and employment of young people by hosting student interns at the business and seeking placement opportunities within the business where they may exist. Project SEARCH™ host businesses can not only support the students enrolled in projects on their site but can also be business advocates for people with disabilities in their industries.

DVRS' VR program will continue to explore unique training, career development, and placement opportunities with NC businesses that may result from greater collaborations with the NC Department of Public Instruction, local education agencies, the NC Community Colleges System, and Title I youth services providers.

Similarly, the Division of Services for the Blind (DSB) VR Employment Services Specialist, VR Counselors and Business Service Representatives will reach out to employers in their geographic areas and statewide to make contact on behalf of the agency to ensure that area employers are aware of what DSB's VR program has to offer regarding their employment needs. They will offer general information on DSB Services including opportunities for internships and job shadowing experiences, the Supported Employment Program, potential employees so that they may represent, disability sensitivity training available and benefits to employers that hire those with disabilities.

The DSB VR Employment Services Specialist, VR Transition Counselors and Community Employment Program Specialists will also communicate with employers regarding the expansive program DSB offers its students and youth with disabilities. They will offer general information on DSB pre-employment transition services and Youth Services including opportunities for work-based learning experiences, the Supported Employment Program, potential employees that we may represent, disability sensitivity training available and benefits to employers that hire those with disabilities.

Other Collaborative Employer Services

In addition to the employer services administered by the WIOA partner programs, the North Carolina Business Committee for Education (NCBCE) is a business-led education non-profit that operates out of the Office of the Governor. NCBCE provides a critical link between North Carolina business leaders and the state's education and workforce decision makers helping to create connections between education and the overall work readiness of citizens across the state. NCBCE partners with statewide education and workforce partners to implement projects that help facilitate the critical link between curriculum content and workforce talent needs. Partners from North Carolina's State Workforce Board and WIOA administrative entities are collaborative partners involved with several of the NCBCE initiatives. These include enhancing career awareness and skill preparation through expanded work-based learning initiatives. NCBCE in collaboration with several partners has launched the "Navigator", which is an online tool designed to connect classroom learning to career learning. Through the Navigator platform employers post work-based learning opportunities including job shadowing, internships and apprenticeships and educators can search for, request, and track these work-based learning resources through an open market environment.

Through its existing collaborations, program offerings, tools, and continued innovation, North Carolina's Workforce System is committed to the provision of effective employer services, best practices and guidance that encourages and enhances the adoption and implementation of comprehensive employer services across all workforce programs in the state.

Partner Engagement with Educational Institutions

NCWorks Career Centers all have formal partnerships with the 58 community colleges across the state, as well as the 115 local public-school districts. Some career centers are even located on a community college campus. Enhanced partnerships and collaboration are highlighted in the NCWorks Commission's criteria for career center certification, which promotes improved customer service at all of the state's one-stop locations. Letters of support from local community colleges and the local school districts are required for initial NCWorks Career Center certification and must show viable partnerships are in place with the local workforce board. Also, many of the state's WIOA youth program contracts are with local school systems. Local boards, community colleges and public schools work together to offer services and activities to youth participants such as Career Days, mentoring, and job shadowing.
Partnership Engagement with education and training providers is written throughout the Carl D. Perkins Career and Technical Education Act. Postsecondary Perkins provides infrastructure funding for career centers. Some NCWorks Career Centers place career counselors and case managers at community colleges. In addition to the career awareness, career planning, and education and training programs offered by high schools and colleges, Career and Technical Education programs at community colleges work together with WIOA to offer opportunities for paid on-the-job training, supportive services such as finish line grants, and shared career counseling. Emphasis on postsecondary credentials, such as one of the accountability measures in Perkins V and the goal of postsecondary credentials in myFutureNC provide the framework for future collaboration

There is community college representation on all 23 Local Workforce Development Boards in North Carolina, and some boards also have representation from local Career and Technical Education programs and unique representation of Adult Education, Title II. North Carolina's Local Workforce Development Boards and career centers are called upon to collaborate with local education partners to help connect NC employers to the NC employees they need to succeed in our state and help our citizens gain new skills and find employment. One key example of this partnership is the state's career pathways initiative (see earlier section on career pathways).

The NCWorks Career Center community college partnerships and the community college representation on the Local Workforce Development Boards facilitate alignment of career and technical education and local workforce needs as the comprehensive responsibility of the North Carolina Community College System includes postsecondary occupational (career and technical education) training. The North Carolina Community College System Office partners with the North Carolina Department of Public Instruction in managing funding provided under the Carl D. Perkins Career Technical Education Act, with the North Carolina Community Colleges implementing the postsecondary career and technical education programming and activities.

Career Pathways

As referenced earlier, the NCWorks Certified Career Pathways are a key element of Governor Cooper's NC Job Ready workforce development initiative to ensure North Carolinians are ready for the jobs of today and tomorrow. The state now has 36 NCWorks Certified Career Pathways across the state and published an "impact report" that focused on the thirteen that had reached one year of implementation by June 30, 2018.

Career Pathways are designed not only for younger students, but also for adults who are looking to advance their careers. Individuals can access a Career Pathway through NCWorks Career Centers, public schools, community colleges, and public and private universities.

They outline and define the following:

- Necessary courses at the high school and college level;
- Required credentials;
- Experience required and the employers in a given area who provide work-based learning activities related to that field; and
- Various certificates and degrees in the related field.

According to the impact report, NCWorks Certified Career Pathways have had a positive impact on the state since their inception, by easing the financial burden of education and training for career seekers; upskilling career seekers, making them attractive candidates for gainful employment; facilitating regional support, capacity building and collaboration for workforce partners; and causing a "domino effect" and inspiring other successes outside of their initial scope.

Vocational Rehabilitation Programs

The Department of Health and Human Services Division of Vocational Rehabilitation Services (DVRS) programs work with NC Community College System in that DVRS has a strong vendor relationship to sponsor training and enable individuals with disabilities to participate in continuing education, diploma, and degree programs. To achieve this, the VR programs maintain relationships with disability support services coordinators at local colleges to assist persons with disabilities in accessing their education and obtaining academic supports. The VR programs also partner with local colleges in the planning, recruitment, and provision of career readiness programs that target individuals who require basic skills training. In some programs, VR contributes financially to a student with a disability's participation in the work-based learning elements of their program.

Additionally, DVRS and colleges within the NCCCS are two of the partner organizations that comprise Project SEARCH™ teams in NC. Project SEARCH™ is a collaborative model serving individuals with the most significant intellectual or developmental disabilities, in which students participate in a series of three internships at the host business as well as job-focused academic skills training to prepare them for integrated, competitive employment in their community. Currently, there are two Project SEARCH™ sites with community college partnerships with the expectation that more will be developed.

The DHHS VR Programs will continue to develop their partnerships with the NCCCS and its colleges through exploring opportunities to combine resources in support of work-based learning opportunities for individuals with disabilities. The VR programs will continue to collaborate on job-driven training programs that will meet the needs of partnering business and industry and assist individuals with disabilities with obtaining credentials, including through the development of training programs at North Carolina's state operated VR facilities WorkSourceEast and WorkSourceWest.

Partner Engagement with Educational Other Education and Training Providers

Governor Cooper is working to make North Carolina a Top Ten Educated State by 2025. A key priority of Governor Cooper's NC Job Ready initiative is skills and education attainment. As the skill requirements of jobs are increasing and rapidly changing, businesses need to find people with the right skills for the jobs they create and North Carolinians need access to training so they can be ready for those jobs. This involves the fostering of partnerships between businesses, educators, and state and local workforce development agencies.

Key to achieving this goal is helping students and job seekers connect to education and training partners within the system as well providers outside the state system. North Carolina has one of the strongest community college and university systems in the country which provide exceptional opportunities for job seekers to acquire the education, skills, and credentials needed to be successful. Other education and training partners are also available and will be identified through the state's Eligible Training Provider List.

The NCWorks Online system allows the individual providers the ability to login and apply to be considered to be on the Eligible Training Provider List (ETPL) to receive referrals of Title I eligible customers. Once they have completed their application, the Local Workforce Development Board that is closest to the primary location will review the application and take the necessary steps to determine if this provider is one that should be on the state list of approved providers. Once a provider is approved, they must then key in all the programs they offer that will again have to be reviewed and approved by a local WDB. Once a provider has been approved for WIOA training, every WDB in the state has the option to certify that this provider can be available in their area. With the two-year review process, they would have to be approved again based on current standards.

The following types of training providers are subject to the ETPL requirements in order to receive WIOA Title I Adult and Dislocated Worker funds to provide training services to eligible adult and dislocated worker individuals:

- Institutions of higher education that provide a program of training that leads to a recognized postsecondary credential;
- Registered Apprenticeship programs registered by the ApprenticeshipNC, which is the state approving agency for North Carolina and is recognized by USDOL Office of Registered Apprenticeship as the approving agency;
- Public or private training providers, including joint labor-management organizations, pre-apprenticeship programs, and occupational/technical training; and
- Providers of adult education and literacy activities provided in combination with occupational skills training.

The local workforce boards may establish additional criteria for program eligibility within a local area through local policy. This may include setting minimum required levels of performance as criteria for training providers to become or remain eligible to provide services in that particular local area. Training providers should be aware that programs may be approved for some local areas and denied for others based on local criteria, and the approved local areas for each training provider will be listed as part of the ETPL.

In addition to collaboration with NCCCS, and sponsorship of postsecondary training at various educational institutions, the VR Programs have established policies and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services. These are described in the Vocational Rehabilitation (VR) Services portion of the Unified Plan under section (d) Coordination with Education Officials.

With regard to the WIOA Title IV program, the NC Division of Vocational Rehabilitation Services modified its state level memorandum of agreement with the Department of Public Instruction in 2018 to outline a collaborative partnership between the two agencies and provide state-level approval and support to expand transition services for students with disabilities, including Pre-employment transition services for students with disabilities that are potentially eligible for VR services. At the local-level VR offices and local education agencies will also continue third-party cooperative agreements that outline how the agencies will partner in the provision of services to students with disabilities, with regard to funding contributions, procedures for information sharing, and referral processes. Currently, the local third-party cooperative agreements are statewide with 96% of all LEAs in North Carolina contributing funding towards 202 positions for VR professional and support staff.

DVRS' and DSB's Vocational Rehabilitation programs will maintain and strengthen their programmatic relationships with school transition services through its continued active participation on the State Capacity Building Team for Transition. This workgroup led by the Department of Public Instruction, also includes the University Center for Development and Learning, Parent/Child Advocacy Agency, Career and Technical Education, and NC Community Colleges System. The Team was established to develop statewide goals and better coordinate transition activities for students with disabilities, enabling this population to achieve post-school outcomes, including employment and post-secondary education. Currently, NC's Capacity Building Plan is focused on improving student involvement in the individualized education program (IEP) process so that planning is more consistent with a student's post-school goals.

DVRS plans to continue collaboration with DPI leadership on technical assistance grants that focus on improving transition services and employment outcomes for transition-aged youth, including re-submission for the National Technical Assistance Center on Transition (NTACT) Intensive Technical Assistance grant.

The VR program administered by the Division of Services for the Blind (DSB) also operates under a formal cooperative agreement with DPI, specific to students of transition age who are blind, deaf-blind, or visually impaired being served by local education agencies and the schools and require VR services in order to become employed. DSB shares information about the transition program and provides technical assistance and consultation to DPI, LEAs, and schools regarding accommodations and assistive technology that will help facilitate the education and VR of students who are blind, deaf-blind, or visually impaired. DSB also has third-party cooperative agreements with twelve LEAs and one regional school that stipulate cost sharing and agency roles and responsibilities.

Additionally, both VR programs, DVRS and DSB, sponsor training from various providers under an individualized plan for employment. This may include postsecondary academic training from a public or private college or university; vocational training from business schools, trade schools, and vocational training programs at the community college level or technical institute level. Sponsorship of such services and supportive services is subject to financial need and provided as appropriate for the client's individualized plan for employment within policy guidelines that include rate schedules. Established standards for training providers, including colleges and universities, proprietary schools, barber and cosmetology schools, commercial driver training schools and other training programs, are stipulated in VR program policy.

Leveraging Resources to Increase Educational Access

Describe how the State's strategies will enable the State to leverage other Federal, State, and local investments that have enhanced access to workforce development programs at the above institutions, described in section (E).

North Carolina is making access to education a priority. A key priority of Governor Cooper's NC Job Ready initiative is skills and education attainment, and Governor Cooper has laid out the goal to make North Carolina a Top Ten Educated State by 2025 by increasing the number of four-year-olds enrolled in high quality pre-K, raising the high school graduation rate, and increasing the number of North Carolinians with a post-secondary degree or credential. An educated North Carolina is a job-ready North Carolina. In addition, NCWorks Certified Career Pathways continue to serve as a fulcrum for increased educational access for citizens and collaboration among workforce partners.

In response to the need for developing a workforce with increased skills and educational attainment, Governor Cooper implemented the Finish Line Grants program, which helps community college students who face unforeseen financial emergencies complete their training. The program will use up to $7 million in WIOA federal funds to help students pay for course materials, housing, medical needs, car repairs, dependent care, or other financial emergencies that students may face through no fault of their own. To date, over 3,700 Finish Line Grants have been awarded.

Governor Cooper has been instrumental in the formation of the myFutureNC goal and the statewide nonprofit organization focused on educational attainment. As North Carolina's economy grows, most new jobs require education beyond a high school diploma—but fewer than half of North Carolinians ages 25-44 have a high-quality postsecondary degree or credential. The mission for myFutureNC is to completely close the educational attainment gap in North Carolina by helping 2 million North Carolinians ages 25-44 achieve high-quality postsecondary attainment by 2030. This goal will help address the needs of employers, equip local communities to take action, and open up new opportunities for North Carolinians.

Other Leveraged Resources to Increase Educational Access

North Carolina currently leverages the following other sources of funding for educational access/workforce development:

- Pell grants. North Carolina community college students rely on Pell grant funding each year.
- GI bill educational resources for veterans and initiatives and tools that make it easier for veterans to crosswalk their military experience and gain educational credit/credentials.
- State, local and private scholarships or sponsorships (e.g., Golden LEAF Foundation, Duke Energy/other private companies, State Employees' Credit Union, and other sources). Funding flows through the State Board of Community Colleges, local community college foundations, and directly to students.
- In addition to its scholarships for individual students, Golden LEAF Foundation is an important source of workforce development grant funding in North Carolina. Grants are made to community colleges, LEAs, nonprofit organizations, and other entities to boost education and training, pay for equipment needed for job training programs, etc.
- The Belk Foundation is supporting key work on career pathways in North Carolina.

Other state and national foundations and corporative giving programs are important for workforce development access and success. North Carolina is part of the National Governor's Association Policy Academy on Early Care Compensation and another academy on Work-Based Learning, which is supporting

educational goal-setting and collaborative workforce development. North Carolina is also part of the Credentials of Value Institute. The Education Strategy Group (ESG), with generous support from the Lumina Foundation, launched the Credentials of Value Institute (COVI) in the fall of 2019. COVI is a one-year cohort-based, cross-sector initiative that will support six leading states – Florida, Kentucky, Massachusetts, North Carolina, Ohio, and Washington- to rigorously and reliably identify non-degree credentials linked to in-demand, high-skill, high-wage occupations, and increasing the number of learners who earn them.

If funding allows after paying for work-related needs, local departments of social services can use Child Care and Development Fund dollars and state Smart Start dollars to assist with subsidized child care for those in training or looking for work.

At the local level, decisions are made by community action agencies (with federal CSBG and private funding sources), nonprofit organizations and/or faith-based organizations to provide transportation assistance, child care assistance and/or occasionally direct educational assistance.

North Carolina is investigating ways to increase the number of SNAP Employment and Training programs across the state and finding linkages to the community college system to help get more food stamp recipients into education and training programs.

NC Community College System Office is going working on a policy analysis to identify barriers to access, including but not limited to education costs, wrap-around costs (transportation, credentialing, child care, etc.) and nonfinancial barriers, and work in collaboration with workforce, education, and nonprofit partners to mitigate barriers.

Track state and federal program changes that could impact education and training affordability, and ensure that support through WIOA programs is connected with community college financial aid resources.

Vocational Rehabilitation Programs

The DVRS and DSB Vocational Rehabilitation Programs plan to maintain and strengthen their programmatic relationships with school transition services through its continued active participation by the Division's Transition Program Specialist on the State Capacity Building Team for Transition. This team, including NC Department of Public Instruction (DPI) leadership, DVRS, University Center for Development and Learning, Parent/Child Advocacy Agency, Career and Technical Education, and NC Community Colleges System representation was formed in recent years to develop statewide goals and provide better coordinated transition activities for students with disabilities to achieve better results with post-school outcomes, including obtaining employment or attending post-secondary education.

Currently, NC's Capacity Building Plan is focused on improving student involvement in the individualized education program (IEP) process so that planning is more meaningful and associated with a student's post-school goals. The state is continuing to work on a Transition Toolkit for teachers and anticipates the development of toolkits for parents, students, and agencies that will be individualized at the local level. DPI consultants are providing transition training to LEAs to promote student-led IEPs, and NC DVR plans to provide training to VR counselors and LEA representatives focusing on the role of the VR Counselor in the IEP process.

DVRS plans to continue collaboration with DPI leadership on technical assistance grants that focus on improving transition services and employment outcomes for transition-aged youth, including re-submission for the National Technical Assistance Center on Transition (NTACT) Intensive Technical Assistance grant.

Description of Policies and Procedures for Coordination with Education Officials

As the Title IV regulations are finalized, DVRS and DSB VR programs plan to increase transition service offerings to students with disabilities through partnerships with NC public schools. Some areas of program development and service enhancement being considered by DVRS are:

- summer internships for students/youth with disabilities;
- increased utilization of On-the-Job Training (OJT) with students and youth;
- utilizing Transition Navigators to identify and serve students with disabilities who are potentially eligible and/or to provide VR pre-employment transition services to groups;
- increasing Project SEARCH™ sites;
- hosting Self-Advocacy summer summits, camps, or school-based workshops;
- enhancing vocational evaluation tools and allocating increased vocational evaluation staff to serve students with disabilities in exploring career options; and
- increasing work-based experiences for students with disabilities who require on-the-job supports, such as job coaching, by partnering in innovative ways with community rehabilitation programs.

DVRS plans to re-brand and revise marketing materials and communications about vocational rehabilitation services to students with disabilities to highlight pre-employment transition services offerings to both students and school personnel. This effort will include targeted marketing for youth disability groups whose incidence within DVRS is declining despite remaining steady or increasing within the public schools (e.g., students with learning disabilities). DVRS will revisit policies related to post-secondary training and learning disability eligibility to ensure that the needs of all eligible students with disabilities as well as those students for whom we are mandated to provide pre-employment transition services are being met in terms of preparing students to obtain competitive integrated employment in such a way to promote advancement and ongoing career development.

By enhancing and incorporating new programs that promote and support work-based experiences, DVRS will continue its commitment to students in pursuit of a high school diploma through the Occupational Course of Study (OCS), a pathway established by the NC Board of Education for students with IEPs to achieve a high school diploma by completing occupational coursework and work experiences. DVRS has recently revised policies for In-School Work Adjustment services to students with significant or most significant disabilities. The service is coordinated through school-based agreements to incentivize a student's participation in school-coordinated work experiences by providing guidance and counseling as well as an incentive payment to students for improvements in work behaviors and attitudes. The Division continues to offer internship and OJT services to students, but hopes to increase utilization and improve feasibility for students, schools, and partnering businesses through policy and procedure revisions and collaboration with workforce system partners. Other pre-employment transition services under consideration are intended to address students' expectations around pursuing employment and to improve their preparedness for participating in additional rehabilitation services, such as training and placement.

DVRS requires each local VR office with vocational rehabilitation counseling staff serving on a local school transition services team to send an annual report to the school systems with which the Division has a cooperative agreement . This report includes data about services and expenditures for students with disabilities provided by the Division, and addresses how VR staff members worked with school staff in transition planning for students with significant and most significant disabilities.

Improving Access to Postsecondary Credentials

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

Governor Cooper's NC Job Ready initiative emphasizes the importance of postsecondary credentials. As referenced earlier regarding myFutureNC, Governor Cooper, other government leaders, business and education leaders have all agreed upon a postsecondary education goal, with resolutions of support by all major workforce and education governance and other policy boards in the state (including the NCWorks Commission). North Carolina will focus efforts by all education and workforce programs to help working adults gain post-secondary credentials either through the state's higher education system or through other strategies such as Registered Apprenticeship and third party industry credentials.

Registered Apprenticeship

North Carolina is also working to grow its Registered Apprenticeship program and make stronger connections with local workforce boards, career centers, and other workforce programs across the state.

NCWorks Career Center staff and ApprenticeshipNC staff are actively working to educate and inform businesses about Registered Apprenticeship as a great way to develop and sustain a talent pipeline to meet their workforce needs. In addition to staff reaching out to businesses, the program also uses businesses with a registered apprenticeship program to talk to other businesses. This peer-to-peer communication has seen success across the state.

NCWorks Career Center staff and ApprenticeshipNC staff are also working to expand the number of public-private partnerships in North Carolina. This model brings together several companies that require similar skills in their workforce and sets up a pre-apprenticeship that leads to a registered apprenticeship program and youth apprenticeships for the group of companies. The state has seen great success with this model and is actively working to expand it.

NC Community College System Areas of Focus

The North Carolina Community College System's 2018-22 strategic plan sets the following goals:

1) Student Interest and Access
2) Clear and Supported Pathways for Student Progress and Success
3) Economic and Workforce Impact
4) System Effectiveness

Under the "Student Interest and Access" goal are the following objectives:

5) Collaborate with stakeholders to promote a workforce system that fosters innovation and establishes seamless connections among community colleges, K-12 education, universities, workforce and economic development partners, and business and industry.
6) Offer relevant, high-quality instructional programs that meet the needs of business and industry for existing and future jobs.
7) Increase student access to work experience [broadly defined, including apprenticeships].

Other sections of the plan address training to fill skill gaps; reducing access barriers for underserved populations; increasing completion of credentials; and career pathways.

Examples of specific strategies that tie in with NCCCS roles in the workforce system:

- Simplify and streamline processes from entry through completion/transfer, effectively incorporating multiple on and off ramps. (This includes alignment with workforce development/Career Centers, which help provide important on-ramps into education/training.)
- Refine foundational and developmental education strategies to accelerate student readiness for college-level instruction. (This includes Adult Education/Literacy strategies.)
- Partner with high schools, universities, and workforce development entities and engage with employers and industry associations at the regional/local levels to identify workforce needs and establish education and training programs collaboratively and comprehensively.

Vocational Rehabilitation Areas of Focus

North Carolina's Vocational Rehabilitation programs improve access to postsecondary credentials for individuals with disabilities through the sponsorship of training and supportive services at colleges, universities, and vocational and occupational training programs as appropriate for the participants' individualized plan for employment. The Vocational Rehabilitation Programs have policies stipulating sponsorship requirements and cost limitations, including academic standards, the requirement for participant financial need and use of any comparable benefits, such as Pell grants, as contributory funding.

Coordinating with Economic Development Strategies.

Throughout the workforce system, economic development partners aid in the identification of economic priorities - key industries and occupations for emphasis in career pathway development, education and training curriculum development, and assistance in reaching businesses that often have less regular communication with workforce development leaders than economic development leaders. In addition, in certain areas, economic development leaders have led the charge for workforce initiatives, ranging from eastern North Carolina regional economic development entities demonstrating the value of WorkReady Communities to efforts in western NC to close the "interest gap" and change perceptions of manufacturing jobs.

North Carolina's key workforce development strategies are well aligned with economic development activities in North Carolina. When the NCWorks Commission was developing its strategic plan, it pulled key strategies from the state 10-year economic development plan, the Jobs Plan, to include in the commission plan to ensure alignment between economic and workforce development. The state economic development plan is a rolling four-year plan. A new plan is currently under development and will be released April 2020 and will have a large emphasis on workforce and workplace (employers). This work has resulted in a workforce development plan that is in alignment with the state's economic development plan. The information below details more specific ways the state's strategies connect with economic development.

Key strategies identified by the NCWorks Commission in its strategic plan are aligned with NC's economic development strategies will help North Carolina current and future businesses be successful. These key statewide strategies are described below:

- Continue to incorporate and promote the NCWorks brand for all workforce development system programs to help customers recognize the value of the system.
- A single brand is needed to create a seamless workforce development system that is easily identifiable to all customers. Citizens, businesses, and key stakeholders will find value in North Carolina's workforce development system when the overwhelming complexity is minimized, and services streamlined.
- A single brand for the entire workforce development system will eliminate the historic focus on individual program services and replace it with a state-wide approach. A common brand also

reduces confusion for those unfamiliar with the system by simplifying the message and increasing the efficiency of statewide outreach.

- Develop and implement a system-wide and consistent outreach strategy.
- Customers of the state's workforce development system may access more than one service. For example, a business looking to grow will need to increase the size of its workforce immediately but also ensure there is a pipeline of workers to continue to fill those positions. The company may be interested in customized training, pre-apprenticeships, youth apprenticeships or a registered apprenticeship programs to ensure it can fill its current and future workforce needs. The workforce development system needs to develop outreach strategies that provide information on the full range of services available.
- Currently, each program promotes its services separately, leaving many businesses confused about what services are available to meet their needs. In addition, combining services across programs is often left up to the customer to figure out. A consistent outreach strategy needs to be developed at the state level that allows for customization at the local level.
- Develop a consistent menu of services and activities highlighting business and industry engagement opportunities and develop interagency protocols to better meet employer and jobseeker needs.

There are many ways for businesses to engage with the workforce development system that will help businesses access the services they need and provide opportunities for individuals to gain work experience necessary to be a successful candidate for employment. A recent survey of businesses found that lack of work experience was one of the top three reasons employers were having difficulty finding the talent they need. However, businesses may not be fully aware of the ways they can connect with the workforce development system to provide opportunities that both help individuals gain the experience they need and develop a pipeline of talent to meet the businesses' need.

Workforce development programs need to work together to identify all the ways that businesses can interact with the workforce development system from facility tours, to internships and externships, to pre-apprenticeships, youth apprenticeships and registered apprenticeships, and on-the-job training opportunities. Then, business outreach specialists can share information with the businesses on the full range of activities, across programs, in which a business can engage to help develop the talent needed to grow their business.

In addition, North Carolina has eight regions across the state that are used to coordinate activities, especially in economic and workforce development. These regions, called Prosperity Zones, aligns key economic, workforce, and education activities. Each major workforce and economic development program including WIOA programs, economic development, community colleges, and public schools has a regional representative in each zone. These regional staff meet together on a regular basis to discuss current economic and workforce development issues.

(b) **State Operating Systems and Policies**

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

(1) The State operating systems that will support the implementation of the State's strategies.

This must include a description of–

State operating systems that support coordinated implementation of State strategies (e.g., labor market information systems, data systems, communication systems, case-management systems, job banks, etc.).

Data-collection and reporting processes used for all programs and activities, including those present in one-stop centers.

The State policies that will support the implementation of the State's strategies (e.g., co-enrollment policies and universal intake processes where appropriate). In addition, provide the State's guidelines for State-administered one-stop partner programs' contributions to a one-stop delivery system.

In addition, provide the State's guidelines for State-administered one-stop partner programs' contributions to a one-stop delivery system.

North Carolina has several policies in place to support the implementation of the State's strategies including integrated service delivery, career center and career pathways certification through the NCWorks Commission, a statewide goal for educational attainment, and performance measures for Local Workforce Development Boards. In addition, North Carolina will continue to review and evaluate statewide policies to support implementation of the state's strategies.

The Division of Workforce Solutions implemented an integrated service delivery model for the programs in Titles I and III. The division maintains memoranda of understanding (MOU) with each Local Workforce Development Board on this delivery model. This MOU includes key policies around integrated teams, use of one case management system, and co-enrollment in Title I and III programs. This delivery model ensures an aligned, customer focused system in all NCWorks Career Centers (NC's one-stop system).

The NCWorks Commission also has several policies that support the implementation of the state's strategies. The commission established criteria for NCWorks Career Centers to ensure they are high quality, customer-focused centers that meet the needs of job seekers and employers. Local Workforce Development Boards must apply to the commission for certification and all centers in their area must be certified. Centers are certified for three years and develop continuous improvement plans that are reviewed by staff every year. Criteria for certification are in the following categories:

- Customer-centered design and accessibility
- Partnerships and integrated services
- Professional staff
- Performance and customer satisfaction

The commission has also created a certification process for NCWorks Certified Career Pathways for recognizing comprehensive career pathways that at helping to develop a talent pipeline for in-demand occupations. Career pathways are a key areas of focus for North Carolina which has been an innovator in developing strategies that support transitions from education to employment. North Carolina's career pathways work brings together three key programs, local workforce boards, community colleges, and the public schools to work with engaged employers. This collaboration identifies and creates clear pathways for in-demand occupations to ensure that the state has the workforce needed for our businesses to succeed. (For more information on career pathways, see Section II (c).)

The NCWorks Commission is also responsible for development state performance measures for Local Workforce Development Boards. The commission has been working with the Local Workforce Development Boards to track performance since 2016. New measures have been approved and data will be tracked for performance starting in 2018. These measures are focused on key activities required by local boards for a comprehensive workforce development system including outreach, employer engagement, training services, development of career pathways, and certified career centers.

North Carolina's workforce development partners are committed to preparing students to enter the workforce, helping job seekers find good jobs, and helping employers find a talented workforce. To

accomplish this task better the NCWorks Commission continues to support cooperation and collaboration among North

Carolina's workforce delivery system partners regarding the use of NCWorks Online. This depends on each partner agency's willingness to encourage all program participants of North Carolina's workforce programs to enroll in NCWorks Online.

By promoting and encouraging workforce program participants to be registered or enrolled in NCWorks Online, the job-matching system will be more robust and offer employers a larger and more varied pool of candidates to choose from.

In addition, with the understanding that each agency has federal policies and requirements to adhere to, a policy group of the NCWorks Commission has discussed possible procedures and protocols that could be improved upon to further support alignment and collaboration.

The NCWorks Commission will continue to work with state agency leaders to review current policies, suggest needed changes to those policies, and identify new policies needed to continue to strengthen the state's workforce development system. Coordination and alignment of this system is a key goal for the commission.

State's guidelines for State-administered one-stop partner programs' contributions

In 2016, the North Carolina Division of Workforce Solutions developed, as part of the NCWorks Career Center Operations Strategic Priorities, a number of Lines of Effort (LOE) to address key initiatives within the North Carolina One-Stop system. These LOE's were created to provide a framework to focus effort and resources, with maximum flexibility at the Local Workforce Development Board level to enhance and improve career center operations. The Cost Sharing Line of Effort (LOE) was developed to enable the implementation of WIOA one-stop partner cost sharing requirements by the January 1, 2018 deadline. Under this initiative, Division staff, Workforce Board Directors, and subject matter experts were charged with assembling a team to address infrastructure cost processes including terms and method for collecting contributions.

A key component of the Cost Sharing LOE, was the convening of a negotiating team representing all of North Carolina's 23 Workforce Development Boards and the required One-Stop partners. This process streamlined negotiations and made it convenient for all parties involved. As a result of the consensus reached by all the required partners, infrastructure costs in North Carolina are funded through the Local Funding Mechanism (LFM). Negotiations focused on seeking contributions from each agency/program equal to the program caps outlined in the State Funding Mechanism (SFM). The caps for each program were 1.5% of the defined eligible budget except for Vocational Rehabilitation (VR) which was 0.75% per the graduated cap outlined in TEGL 17-16. VR's contribution should increase in subsequent years by 0.25% until reaching 1.5%. Should the partner agencies fail to agree on the terms of implementing the IFA, the matter will be referred to the Governor. As part of the Cost Sharing LOE, the partners drafted a memorandum of understanding (MOU) template to be used by each Local Workforce Development Board. The completed signed partner agreements were submitted to the State. Cost sharing summaries were issued and PY2017 partner contributions (six months) were collected in November of 2017. PY2018 contributions and a new memorandum of understanding with infrastructure cost agreement addendums will be due by July 1, 2018.

The North Carolina Division of Workforce Solutions is in the process of finalizing and issuing formal policy that outlines the infrastructure cost sharing information and includes a required template for the Memorandum of Understanding (MOU) and the Infrastructure Cost Agreement addendum. Policy is scheduled to be issued in May 2018.

(2) State Program and State Board Overview.

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

The NCWorks Commission guides the workforce development system in North Carolina. The state's Workforce Development System is comprised of an expansive group of state and local agencies; public and private educational systems and institutions; private training providers and nonprofit organizations. At the statewide level, there are seven entities with administrative, oversight and/or operational responsibilities for the state's workforce development activities. These entities include the North Carolina Department of Commerce, the North Carolina Department of Health and Human Services, the North Carolina Department of Administration, the North Carolina Department of Public Instruction, the North Carolina Community College System, the University of North Carolina System and the North Carolina Independent Colleges and Universities. These administrative entities and their respective institutions and programs play a vital role in helping to educate the state's citizens and preparing the state's current and future workforce.

The North Carolina Department of Commerce is comprised of several divisions and affiliated commissions which provide economic, community and workforce development services to the state's businesses and citizens. The agency is overseen by the Secretary who is appointed by the Governor. The Secretary of Commerce serves on Governor Cooper's Education Cabinet as well as on the NCWorks Commission.

Commerce's finance and rural economic development divisions provide administrative oversight and operational support for state and local economic and community development activities. The agency's workforce development activities are provided to the state's citizens and businesses through three divisions: the Division of Workforce Solutions (DWS), the Division of Employment Security (DES) and the Labor and Economic Analysis Division (LEAD). In addition, the Department of Commerce provides administrative staff support for the NCWorks Commission (North Carolina's State Workforce Development Board).

The Division of Workforce Solutions (DWS) has administrative responsibility for several of the state's workforce development programs and services. These include Workforce Innovation and Opportunity Act (WIOA) Title I programs (Adult, Dislocated Worker and Youth), WIOA Title III the Wagner Peyser Act program, Trade Act program, Veteran's Employment and Training Services and the Agriculture Employment program. DWS has a state level staff that provide administrative oversight for programs as well as local staff who provide direct services for Wagner Peyser and Trade Act programs at area NCWorks Career Centers. In addition, DWS has eight Regional Operations Directors (RODs) that support the 23 Local Workforce Development Board Directors and the North Carolina Department of Commerce to facilitate the coordination of workforce, economic development, and educational services across the state's eight prosperity zones. The division supports the Local Workforce Development Boards' oversight for North Carolina's 83 local NCWorks Career Centers.

The Department of Commerce's Division of Employment Security (DES) operates the state's unemployment insurance (UI) system. This includes management and operation of the state's UI Tax system, UI claims and UI benefit payment activities. DWS works in collaboration with DES to provide reemployment assistance to eligible UI claimants.

The Labor and Economic Analysis Division (LEAD) provides a variety of research and technical support to the state's workforce development, economic development and educational systems, programs and activities. This includes the provision of labor market information, training on the use of labor market and workforce information, research and analysis of the state's workforce and economy, evaluation of education and workforce programs and research support for state and local economic development activities.

The North Carolina Department of Health and Human Services (DHHS) is comprised of several divisions and programs which provide services to the state's residents. The agency is overseen by a Secretary who is appointed by the Governor. The agency has administrative responsibility for several divisions that provide workforce development related services and activities. These include the Division of Social Services (DSS), the Division of Aging and Adult Services (DAAS); the Division of Mental Health, Developmental Disabilities and Substance Abuse Services (MH/DD/SAS), the Division of Vocational Rehabilitation Services (DVRS) and the Division of Services for the Blind (DSB). The DHHS Secretary serves on Governor Cooper's Education Cabinet as well as on the NCWorks Commission.

The Division of Social Services provides administrative oversight for the state's Temporary Assistance to Needy Families (TANF) employment program (NC WorkFirst), the Food and Nutrition Employment and Training Program (NC FNS E&T), and the Community Services Block Grant programs. DSS provides oversight and support to the 100 county social services agencies that deliver the services and benefits to individuals and families. The Division of Aging and Adult Services has administrative responsibilities for the Senior Community Service Employment Services, while the Division of Mental Health, Developmental Disabilities and Substance Abuse Services oversees the Long-Term Vocational Support Services.

In North Carolina there are two entities with administrative responsibility for the services provided under the WIOA Title IV Rehabilitation Act program: the Division of Vocational Rehabilitation Services (DVRS) and the Division of Services for the Bind (DSB). Both DVRS and DSB are administratively housed within the North Carolina Department of Health and Human Services. DSB is responsible for administration of Vocational Rehabilitation Title IV services to individuals who are blind, deafblind, and visually impaired and the DVRS is responsible for administration of VR Title IV services to individuals with all other disabilities. Title IV services are provided via 80 locations throughout the state.

The North Carolina Commission of Indian Affairs is housed within the North Carolina Department of Administration. The Department of Administration is overseen by a Secretary who is appointed by the Governor. The Commission of Indian Affairs operates a WIOA Section 166 workforce development program that targets the needs of unemployed, underemployed and low-income American Indians in North Carolina. The Commission's WIOA program director serves on the NCWorks Commission.

The North Carolina Department of Public Instruction has administrative oversight for implementing the state's public-school laws for pre-K through 12th grade. Responsibilities are carried out under the direction of the State Board of Education and the State Superintendent of Public Instruction. The State Superintendent is elected by the people and the State Board of Education includes the Lieutenant Governor, the State Treasurer, and 11 members who are appointed by the Governor and confirmed by the North Carolina General Assembly. The State Superintendent serves on Governor Cooper's Education Cabinet as well as on the NCWorks Commission.

DPI provides leadership and service to 116 local public school districts and to more than 2,500 district public schools, over 180 charter schools, and three residential schools for students with hearing and visual impairments. DPI provides support and administrative oversight for educational programming including secondary programs under the Carl Perkins Act, while the North Carolina Community College System provides administrative oversight for post-secondary Perkins Act programs.

The North Carolina Community College System (NCCCS) provides a comprehensive array of educational and training programs and a diverse set of services to individuals and employers through 58 colleges. It is the third largest community college system in the nation with programs and services provided through 223 locations (58 main campuses and 165 remote locations) throughout the state. The North Carolina Community College System Office staff provides state-level administrative support for the System under the direction of the State Board of Community Colleges. The state board is comprised of 21 members including the Lieutenant Governor (or designee), the State Treasurer (or designee) and members who are appointed by the Governor and North Carolina General Assembly. The Board is responsible for electing a

system president and for the adoption and administration of policies, regulations and standards for the System. Each of the 58 local colleges is governed by a local board of trustees with responsibility for electing a president that serves as the college's chief executive officer. The NCCCS President serves on Governor Cooper's Education Cabinet, as well as on the NCWorks Commission and serves as a co-chair of myFutureNC.

Educational and training programs offered through the 58 colleges include a diverse group of programmatic and course offerings organized into several administrative programmatic areas which include Curriculum programs, Continuing Education programs, Economic Development programs and Basic Skills programs. Curriculum programs operated by the NCCCS include a variety of educational programs which range in length from one semester to two years. Within the NCCCS Curriculum program area are those programs which receive part of their funding through the U.S. Department of Education's Carl D. Perkins Career and Technical Educational Act. The North Carolina Department of Public Instruction (DPI) is the recipient of the federal Perkins Act funds and works in collaboration with the NCCCS to implement and deliver the programs and activities required under the Act.

Continuing Education Programs operated by the North Carolina Community Colleges include non-credit courses related to a diverse set of occupational training, workforce development training, community service training and business and industry training. Courses are designed to assist individuals in gaining short term training and skill enhancement including occupational skills, entrepreneurial skills, personal growth and development. Organized within the North Carolina Community College Continuing Education programs are several programmatic areas including Workforce Continuing Education Training and Human Resources Development programs.

The NCCCS Economic Development area oversees several of the state's workforce training initiatives including the ApprenticeshipNC, BioNetwork, Customized Training and the Small Business Center Network. The ApprenticeshipNC programs are employer driven programs that combine on-the job learning with related classroom instruction. programs help workers learn specialized skills needed in today's economy.

ApprenticeshipNC is recognized by the U.S. Department of Labor as the State Apprenticeship Agency (SAA) for the state of North Carolina. As the SAA, the ApprenticeshipNC director has the responsibility of reviewing and approving all registered apprenticeship programs.

ApprenticeshipNC also provides additional work-based learning programs to meet industry needs, such as Pre-Apprenticeship and Youth Apprenticeship. ApprenticeshipNC has an advisory council of 13 members that consist of a combination of employers and agency representatives. The Apprenticeship Council provides guidance and assistance in the promotion of Registered Apprenticeship in North Carolina.

The Career and College Readiness program area is responsible for the administration of the state's WIOA Title II, Adult Education and Family Literacy Act (AEFLA) programs. AEFLA programs serve every NC county through community colleges and community-based organizations.

Through a competitive request for proposal process, eligible providers apply for Title II funds to supplement their adult education programs. Competitive applicants are awarded funds to work collaboratively with core WIOA partners to provide services and activities that improve adult literacy skills and knowledge for postsecondary transition and or employment. The Curriculum and Workforce Continuing Education departments, Registered NC Apprenticeships /work units of NC community colleges are the main training partners for adult education providers. This allows for an increased capacity for Title II Adult Education providers to implement accelerated models of credential attainment such as Integrated Education and Training and Pre-Apprenticeships linked to Registered Apprenticeships, and models that specifically support English language learners.

North Carolina's Community College System and its 58 colleges are a valuable component of the NCWorks system. The colleges provide a diverse group of program offerings with many of the programs included on

the state's Eligible Training Provider list. A large proportion of the state's WIOA training services are provided through the North Carolina Community Colleges. In addition, many of the colleges serve as contractors for WIOA services and there are 11 NCWorks Career Centers and several affiliated sites located on Community College campuses.

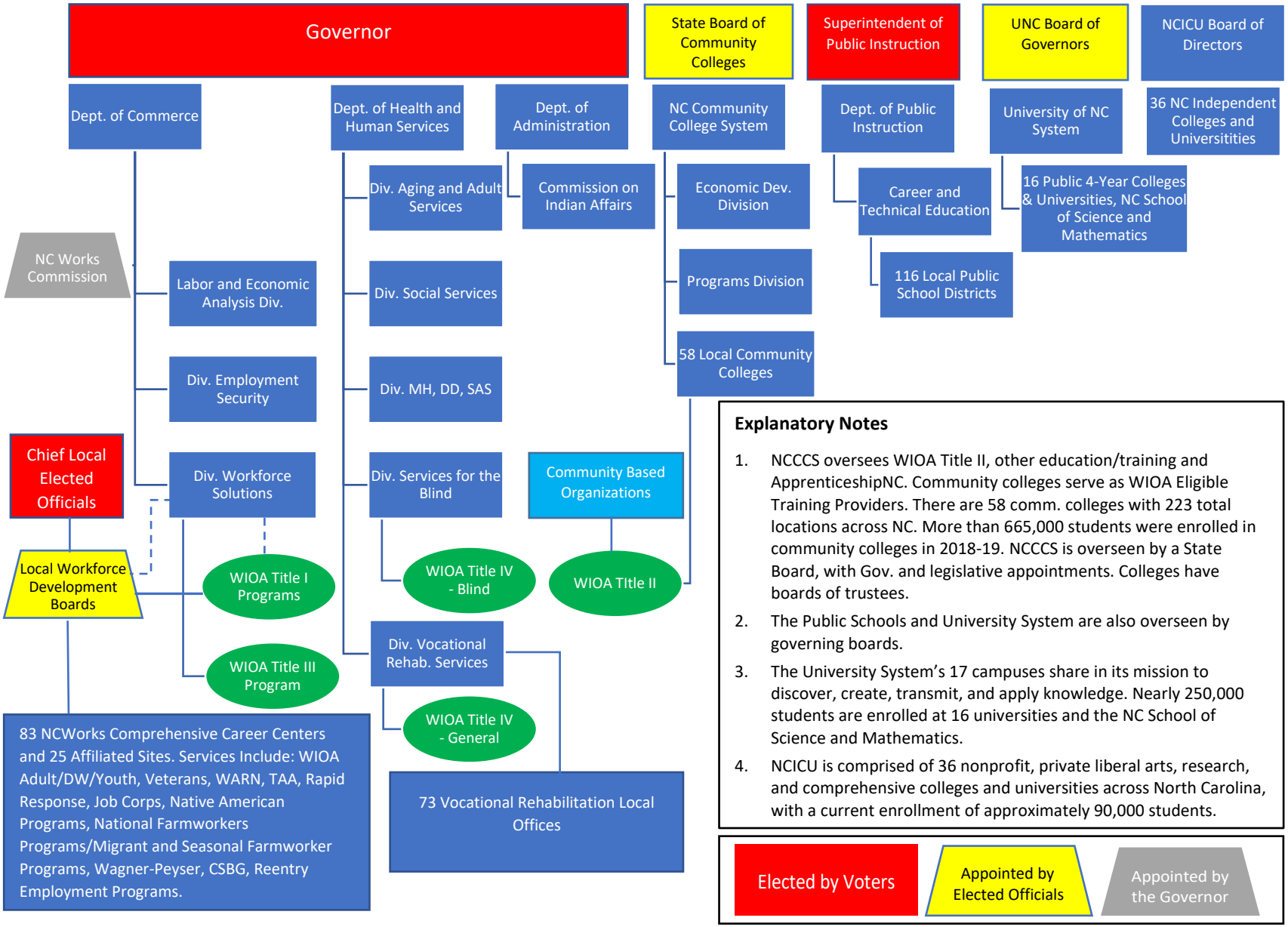
The University of North Carolina (UNC) System is a public, multi-campus university dedicated to the service of North Carolina and its people. The System is comprised of all 16 of North Carolina's public institutions that grant baccalaureate degrees as well as the North Carolina School of Science and Mathematics and numerous research centers and institutions throughout the state as well the UNC System administrative offices.

The UNC System is overseen by a 28-member Board of Governors, whose members are elected by the North Carolina General Assembly. The Board is responsible for planning and developing a coordinated system of higher education in North Carolina and for coordinating its work with the North Carolina Community College System and private colleges and universities in the state. The Board is responsible for electing a president of the University of North Carolina System who is the chief administrative officer of the University. Each of the 16 public institutions of higher education has their own Boards of Trustees and Chancellors who are elected by the Board of Governors. The UNC System President serves on Governor Cooper's Education Cabinet as well as on the NCWorks Commission.

The University of North Carolina enrolls a diverse group of students in over 120 academic programs of study. The 16 higher educational institutions provide a diverse set of academic areas which lead to Baccalaureate, Post Baccalaureate, Masters', Post Master's Certificates, Specialist, First Professional, Doctoral Degrees. Programmatic offerings and degree levels vary by institution. While the North Carolina School of Science and Mathematics is a public high school that provides academic offerings concentrated in Science, Technology and Mathematics (STEM) areas through residential, online and summer programs.

North Carolina Independent Colleges and Universities (NCICU) is the private, nonprofit, statewide office of private higher education in North Carolina, addressing matters of state and federal policy and representing private colleges and universities across the state in collaboration with North Carolina's other education and workforce partners. The NCICU represents all 36 private nonprofit liberal arts, research, and comprehensive colleges and universities in North Carolina accredited by the Commission on Colleges of the Southern Association of Colleges and Schools (SACS). NCICU's board of directors includes the presidents of each of the 36 institutions. Its member institutions provide a diverse set of programmatic offerings across various post-secondary degrees as well as non-degree offerings. The NCICU president serves on Governor Cooper's Education Cabinet as well as on the NCWorks Commission.

North Carolina Workforce Development System



Explanatory Notes

1. NCCCS oversees WIOA Title II, other education/training and ApprenticeshipNC. Community colleges serve as WIOA Eligible Training Providers. There are 58 comm. colleges with 223 total locations across NC. More than 665,000 students were enrolled in community colleges in 2018-19. NCCCS is overseen by a State Board, with Gov. and legislative appointments. Colleges have boards of trustees.
2. The Public Schools and University System are also overseen by governing boards.
3. The University System's 17 campuses share in its mission to discover, create, transmit, and apply knowledge. Nearly 250,000 students are enrolled at 16 universities and the NC School of Science and Mathematics.
4. NCICU is comprised of 36 nonprofit, private liberal arts, research, and comprehensive colleges and universities across North Carolina, with a current enrollment of approximately 90,000 students.

State Board

Provide a description of the State Board, including-

Membership Roster. Provide a membership roster for the State Board, including members' organizational affiliations.

(i) Board Activities. Provide a description of the activities that will assist State Board members and staff in carrying out State Board functions effectively.

The NCWorks Commission is the designated State Workforce Development Board for North Carolina. The commission operates in accordance with the federal Workforce Innovation and Opportunity Act, North Carolina General Statute, and commission bylaws. Appointees are given the responsibility for setting the strategic direction of the state-wide workforce development system. Commission members advise state leaders on how to strengthen the state's workforce and serve North Carolina businesses. The commission also develops policy to align workforce programs, assesses the effectiveness of core programs, and oversees the NCWorks Career Center system. Membership Roster.

Representation on the NCWorks Commission is mandated by federal and state law. Commission membership includes workforce agency leaders, elected officials, private sector members, and representatives from the state's labor, training, and community-based organizations. As defined by WIOA, the majority of the NCWorks Commission members are private business representatives. All members are appointed to four-year terms by the Governor. Agency Administrators from the Department of Health and Human Services, Department of Administration, Department of Public Instruction, North Carolina Community College System, University of North Carolina System, and Department of Commerce all serve as ex-officio members.

Member Name	**Affiliation**	**Organization**
Roy Cooper	Government Representative	Governor, State of North Carolina
Mark Johnson	Government Representative	State Superintendent, North Carolina Department of Public Instruction
Machelle Sanders	Government Representative	Secretary, North Carolina Department of Administration
Peter Hans	Government Representative	President, North Carolina Community College System
Tony Copeland	Government Representative	Secretary, North Carolina Department of Commerce
Mandy Cohen	Government Representative	Secretary, North Carolina Department of Health & Human Services
William Roper	Government Representative	President, University of North Carolina System
Shawn Brown	Local Elected City Official	Mayor, City of Claremont
Ronnie Smith	Local Elected County Official	Commissioner of Martin County
Tom Rabon, Chair	Private Business Representative	New Kind
David Miller	Private Business Representative	Spirit AeroSystems

Josh Arant	Private Business Representative	Mako Medical Laboratories
Suzanne Johnson	Private Business Representative	Grifols
Olalah Njenga	Private Business Representative	YellowWood Group
Melanie Chernoff	Private Business Representative	Red Hat, Inc.
Anita Bachmann	Private Business Representative	United Health Care
Himanshu Karvir	Private Business Representative	Virtelle Hospitality
Kim Toler	Private Business Representative	PotashCorp
Jim Van Camp	Private Business Representative	Van Camp & Van O' Linda Law Firm
Marti Matthews Martin	Private Business Representative	PPDI
Osceola Ellis	Private Business Representative	Military Relocator Real Estate & Property Management
Paul Lawler	Private Business Representative	International Economic Development Council
Christopher Gergen	Private Business Representative	Forward Impact
Pam Townsend	Private Business Representative	WSP USA
Brock Ashburn	Private Business Representative	Highland Brewing Company
Michael Okun	Labor Representative	North Carolina State AFL-CIO
MaryBe McMillan	Labor Representative	North Carolina State AFL-CIO
Walter Siegenthaler	Apprenticeship Representative	Max Daetwyler Corporation
Sherry Carpenter	Community Based Organization	Goodwill Industries
Steven Hunt	Workforce and Adult Education Representative	Robeson Community College
Hope Williams	Community Based Organization	North Carolina Independent Colleges and Universities
Jeffrey Frederick	Community Based Organization	North Carolina Association of Workforce Boards

Board Activities Committees

The work of the commission is accomplished through the work of committees. These committees, established by the chair, are created purposefully to accomplish the goals of the commission's 2019-2021 strategic plan and to carry out the functions under section 101(d) of WIOA. Each committee is led by a chair and is supported by NCWorks Commission staff. The committee chairs, along with the NCWorks Commission chairman make up the Commission's the Executive Committee. Each of the commission member serves on one of the committees.

Meetings

The commission conducts quarterly business meetings at the call of the chair. Business meetings are attended by the entire commission and are open to the public. Meeting agendas are developed by commission staff and approved by the chair. Actions of the commission are determined by a majority vote of the members present, and a majority of the commission constitutes a quorum for the transaction of business. The rules set forth in Robert's Rules of Order, Newly Revised govern the procedures of the commission.

The commission also conducts committee meetings. Committees meet several times a year and are scheduled at the discretion of the committee chairs. These meetings are attended by the assigned committee members, its chair, and NCWorks Commission staff.

Several key staff assist the NCWorks Commission members and staff carry out state board functions. The NCWorks Commission has assembled a group of agency leaders to help coordinate and integrate workforce programs across agencies. This State-Agency Sub-Committee *works* on policy alignment, a unified branding and outreach strategy, a unified business services strategy, and creating regional teams for North Carolina's eight Prosperity Zones to ensure a consistent and comprehensive approach to workforce development in each zone.

Additionally, the commission is developing strategies to support the use of sector strategies to provide individuals, including low-skilled adults, youth and individuals with barriers to employment, with workforce development activities, education, and supportive services to enter or retain employment.

Assessment and Evaluation of Programs and One-Stop Program Partners.

Assessment of Core Programs

Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. This State assessment must include the quality, effectiveness, and improvement of programs broken down by local area or provider. Such state assessments should take into account local and regional planning goals.

The NCWorks Commission is responsible for assessing NC's workforce development system, including core WIOA programs. This work is accomplished by the Commission's Governance and System Alignment Committee which reports to the full commission at each quarterly meeting.

State law requires the commission to annually review and evaluate the plans and programs for all federally- or state-funded workforce development programs. In 2014, the NCWorks Commission completed a review of 20 workforce development program plans, policies and services across five agencies in North Carolina. This review included an analysis of core programs as well as other one-stop delivery system partners. The commission reviewed workforce program funding levels and sources, service provision types, special populations served and business outreach initiatives. (See section II(a) 2(A) for a summary.) As a result of this review, the NCWorks Career Center Certification process was updated, beginning in Program Year 2017.

The Commission is required to develop and continuously improve performance measures to assess the effectiveness of workforce training and employment in the state. The workforce development system agencies worked collaboratively to design and implement universal performance measures. The commission which oversaw these efforts, recognized that by using common metrics and applying them across a wide range of workforce programs, the performance measures offer a comprehensive program-by-program look at North Carolina's workforce system.

The commission's Governance and System Alignment committee reviews the operation, services, and performance of core programs as directed by WIOA. The commission is also required to develop state performance accountability measures for Local Workforce Development Boards. Increased contact and outreach with Chief Local Elected Officials is needed to provide support and training on their role in effective administration of WIOA dollars.

Assessment of One-Stop Program Partners

Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. Such state assessments should take into account local and regional planning goals.

The NCWorks Commission is responsible for reviewing and evaluating the workforce development system in North Carolina which includes core WIOA programs and one-stop partner program services. See answer to question III (b)(4)(A) for more details.

Previous Assessment Results

Beginning with the state plan modification in 2018 and for subsequent state plans and state plan modifications, provide the results of assessments of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner programs included in the Unified or Combined State plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle). Describe how the State is adapting its strategies based on these assessments.

Performance from the first two years of WIOA will be used as the baseline for future assessments of the effectiveness of core programs and NCWorks Career Center partners.

In August 2019, the NCWorks Commission conducted its most recent annual review, which surveyed 19 statewide workforce development programs administered across the Department of Commerce, Department of Health and Human Services, Department of Public Instruction, Department of Administration, and the Community College System. Survey results show that North Carolina's workforce development system serves a wide variety of customers, the most common of which are the unemployed, and underemployed, and low-income individuals, and adults and youth ages 16-24. These programs target youth and adults over 55 least frequently. The programs across the workforce development system offer a wide variety of services to jobseekers in North Carolina. Services include education/training, interview preparations and assessments, resume assistance and job search assistance, and career counseling. Over half of the programs provide various employability and soft skills training—focusing on critical skills like communication, time management, and work adjustment training.

The commission also is required to develop state performance accountability measures for Local Workforce Development Boards. The commission developed these measures in consultation with the Local Workforce Development Board Directors and chairs to complement the WIOA federal primary indicators of performance for adult and youth training and employment. Measuring the performance of Local Workforce Development Boards will provide all job seekers, workers, and businesses with high quality career, training and supportive services that they need to succeed. In an effort to identify future opportunities for change and continuous improvement, the NCWorks Commission adjusted measure targets and will vote to approve these updated measures for 2018 to reflect previous performance.

Evaluation

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

North Carolina will conduct assessments of WIOA core programs as part of the overarching NCWorks system. Plans for this comprehensive assessment process include:

- Collective regular reviews by the State Steering Council which include agency leaders from all WIOA core programs on data reflecting enrollment and co-enrollment, resource sharing among core partners, measures of effectiveness and efficiency and an analysis of mutually agreed upon targets for expected and achieved performance. Further, data from all core partners on consumer input will also be collected, shared, and summarized.
- Formative evaluation on goals established to guide, and focus core partner activities on alignment, coordination of services, referrals, resource sharing, and other important partner engagement activities at both the state and local levels. The result of this assessment will be to determine the level and breadth of partner engagement in serving North Carolina's workforce system in a coordinated, purposeful manner.
- Annual performance evaluation by NCWorks Commission of efficiency and effectiveness of core programs and NCWorks Career Center system and measures of satisfaction of consumers, both businesses and individuals served in the system. Other measures of performance would include the employment and retention outcomes, post-secondary achievements and an examination of the level of penetration into groups and individuals eligible for services and the degree to which the workforce system has reached them.
- State performance measures were set by the NCWorks Commission for local workforce boards beginning in program year 2016. These measures were developed in conjunction with board staff and will be complimentary to the federal performance measures.
- Engagement of outside consultation for third-party review, analysis, evaluation and recommendations for continuous improvement of services and resulting outcomes. Utilizing North Carolina's excellent public and private universities' research capabilities is anticipated.
- The NCWorks Commission continues to work with the North Carolina Department of Commerce to conduct research projects on employer needs every two years to follow up on two previous studies, best practices in key topics, and other key areas of research to help improve the workforce development system.
- As part of overall workforce system evaluation and the NCWorks' goal to increase skills and education attainment, the NCWorks Commission will review and report on WIOA funding support of education and training, number of individuals educated or trained through WIOA programs, credential attainment, and related topics.

Program assessments conducted during the final two years of the Workforce Investment Act by the NCWorks Commission were reviewed and considered in formulating North Carolina's Unified Plan. Performance from the first two years of WIOA will be used as the baseline for future assessments of the effectiveness of core programs and NCWorks Career Center system. From the baseline assessment on program performance targets will be established and regularly monitored by individual core partner agencies as well as the State Steering Council and the NCWorks Commission. Program performance targets will demonstrate North Carolina's best effort in reaching a diverse workforce and maximizing the system's resources to prepare workers for the demands and needs of employers currently and in years to come.

Under circumstances where performance targets fall short of expected levels an analysis will be conducted regarding the reasons with suggested means of improving performance for the next reporting period.

Distribution of Funds for Core Programs.

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

For Title I programs, provide a description of the written policies that establish the State's methods and factors used to distribute funds to local areas for—

Youth activities in accordance with WIOA section 128(b)(2) or (b)(3),
Adult and training activities in accordance with WIOA section 133(b)(2) or (b)(3),

WIOA Adult Activities Formula:

- 1/3: State relative share of total unemployment in areas of substantial unemployment (ASU) (average 12 months ending 6/30)
- 1/3: State relative share of excess unemployment (average 12 months ending 6/30)
- 1/3: State relative share of economically disadvantaged Adult (American Community Survey 2011-2015)

In order to ensure that North Carolina is in compliance with USDOL requirement's for Dislocated Worker allocations for PY 2019, the formula for each local board's Dislocated Worker allocation was modified slightly. The reason for the modification is to include the required element: Declining Industries. As a result, the new formula is comprised of the following components:

- 30% Insured Unemployment
- 30% Excess Unemployment
- 30% Long-term Unemployment
- 10% Declining Industries

In April or early May of each year, the Employment and Training Administration (ETA) of the Federal Department of Labor (DOL) releases a Training and Employment Guidance Letter (TEGL) that provides the program allotment amounts and specifics on the formulas states should use to determine the allocation amount for each Workforce Development Board (WDB). Out of each program's total allocation amount, an administrative holdback amount to be used for statewide workforce investment activities is deducted from the total. The percentage can vary year to year and program to program. In addition, the Dislocated Worker program also has a percentage of its allocation deducted, to be used for statewide rapid response activities. For PY 2019, the percentages deducted were as follows:

Adult	15% administrative holdback
Youth	15% administrative holdback
Dislocated Worker	15% administrative holdback

	25% statewide rapid response holdback

Also included in the TEGL, is the ratio of July to October funding for the Adult and Dislocated Worker programs. Youth funds are not divided into two distributions. Once the Local Area allocation amounts have been calculated, this ratio is then used to determine what amount is available for July and what is available for October. For PY 2019, that ratio was:

Program	July Percentage	October Percentage
Adult	15.8338%	84.1662%
Dislocated Worker	17.4178%	82.5822%

Once the total allocation amounts for each program are known, the DOL-provided formulas are then used to calculate the Local Area allocation amounts. All three programs (Adult, Youth, Dislocated Worker) have a minimum allocation amount in effect, defined as follows:

The local area shall not receive an allocation percentage that is less than 90 percent of the average allocation percentage of the local area for the two preceding years. Amounts necessary for increasing such allocations to local areas to comply with this requirement are to be obtained by proportionally reducing the allocations of the other local areas.

The formulas used for each program, as well as the definitions of some important terms within those formulas, are included below, sourced from TEGL 16-18.

Dislocated worker employment and training activities in accordance with WIOA section 133(b)(2) and based on data and weights assigned

For Title II*:*

Describe how the eligible agency will award multi-year grants or contracts on a competitive basis to eligible providers in the State, including how eligible agencies will establish that eligible providers are organizations of demonstrated effectiveness.
Describe how the eligible agency will ensure direct and equitable access to all eligible providers to apply and compete for funds and how the eligible agency will ensure that it is using the same grant or contract announcement and application procedure for all eligible providers.

Describe the process and the factors used by the State to determine the distribution of funds among the two VR agencies in the State.

In order to ensure that North Carolina is in compliance with USDOL requirement's for Dislocated Worker allocations for PY 2019, the formula for each local board's Dislocated Worker allocation was modified slightly. The reason for the modification is to include the required element: Declining Industries. As a result, the new formula is comprised of the following components:

- 30% Insured Unemployment

- 30% Excess Unemployment
- 30% Long-term Unemployment
- 10% Declining Industries

In April or early May of each year, the Employment and Training Administration (ETA) of the Federal Department of Labor (DOL) releases a Training and Employment Guidance Letter (TEGL) that provides the program allotment amounts and specifics on the formulas states should use to determine the allocation amount for each Workforce Development Board (WDB). Out of each program's total allocation amount, an administrative holdback amount to be used for statewide workforce investment activities is deducted from the total. The percentage can vary year to year and program to program. In addition, the Dislocated Worker program also has a percentage of its allocation deducted, to be used for statewide rapid response activities. For PY 2019, the percentages deducted were as follows:

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The local area shall not receive an allocation percentage that is less than 90 percent of the average allocation percentage of the local area for the two preceding years. Amounts necessary for increasing such allocations to local areas to comply with this requirement are to be obtained by proportionally reducing the allocations of the other local areas.

The formulas used for each program, as well as the definitions of some important terms within those formulas, are included below, sourced from TEGL 16-18.

(A) State's methods and factors used to distribute funds to local areas for—

(i) Youth activities in accordance with WIOA section 128(b)(2) or (b)(3),

WIOA Youth Activities Formula:

1/3: State relative share of total unemployment in areas of substantial unemployment (ASU) (average 12 months ending 6/30)

1/3: State relative share of excess unemployment (average 12 months ending 6/30)

1/3: State relative share of economically disadvantaged youth (American Community Survey)

Policy Statement 04-2019 Change 1 references The U.S. Department of Labor (USDOL) released revised WIOA Allotments for PY 2019 (July 1, 2019 – June 30, 2020) for Adult, Dislocated Worker, and Youth Activities in Training and Employment Guidance Letter (TEGL) No. 16-18, Change 1.

Funding for PY 2019 has been adjusted to restore the PY 2019 appropriated funding set aside for program integrity and evaluation purposes. Funding change impacts October portion of WIOA funds only. The state allotments are based on funds appropriated to the USDOL by the United States Congress through the Consolidated Appropriations Act, 2019, Public Law 115-245. According to the Act, Youth Activities funds become available for obligation on April 1, 2019. However, the Act funds the WIOA Adult and Dislocated Worker programs in two separate appropriations.

The first becomes available for obligation on July 1, 2019; this portion is commonly referred to as the "base" funds. The second becomes available for obligation on October 1, 2019; this portion is commonly referred to as "advance" funds because they are provided in the Appropriations Act passed during the fiscal year immediately before the fiscal year when the funds are available. In order to ensure that North Carolina is in compliance with USDOL requirement's for Dislocated Worker allocations for PY 2019, the formula for each local Board's Dislocated Worker allocation was modified slightly.

The reason for the modification is to include the required element: Declining Industries. As a result, the new formula is comprised of the following components: An Equal Opportunity/Affirmative Action Employer/Program Auxiliary aids and services available upon request to individuals with disabilities.

- 30% Insured Unemployment
- 30% Excess Unemployment
- 30% Long-term Unemployment
- 10% Declining Industries

Declining Industries consist of the change from the 3rd Quarter of one year to the 3rd Quarter of the next in the number of establishments in each county. For this year's calculations, that data consists of the change in the count of establishments from the 3rd Quarter of Calendar Year 2017 compared to the 3rd Quarter of Calendar Year 2018. It should be noted that Adult and Youth allocation formulas are unchanged. Also, the Hold Harmless provision remains in effect for all three program allocations calculations. The Hold Harmless provision ensures that "no local area receives an allocation percentage that is less than 90 percent of the average allocation percentage received by the local area for the previous two years" (TEGL 16-18, Change 1)

Please reference PS04-2019, Change 1 noted above.

Vocational Rehabilitation Program:

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

Funds distribution between the Divisions of Vocational Rehabilitation Services and Division of Services for the Blind are based on distribution calculations based on previous' expenditure levels for each agency while allowing for sufficient carry forward to maintain on-going operations in the event of a disruption of federal funding.

Program Data

1. Data Alignment and Integration.

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

Describe the State's plans to make the management information systems for the core programs interoperable to maximize the efficient exchange of common data elements to support assessment and evaluation.

Describe the State's plans to integrate data systems to facilitate streamlined intake and service delivery to track participation across all programs included in this plan.

Explain how the State board will assist the Governor in aligning technology and data systems across required one-stop partner programs (including design and implementation of common intake, data collection, etc.) and how such alignment will improve service delivery to individuals, including unemployed individuals.

Describe the State's plans to develop and produce the reports required under section 116, performance accountability system

Planning Note: States should be aware that Section 116(i)(1) requires the core programs, local boards, and chief elected officials to establish and operate a fiscal and management accountability information system based on guidelines established by the Secretaries of Labor and Education. States should begin laying the groundwork for these fiscal and management accountability requirements, recognizing that adjustments to meet the elements above may provide opportunity or have impact on such a fiscal and management accountability system.

Assessment of Participants' Post-Program Success.

Describe how lead State agencies will use the workforce development system to assess the progress of participants who are exiting from core programs in entering, persisting in, and completing postsecondary education, or entering or remaining in employment. States may choose to set additional indicators of performance.

Use of Unemployment Insurance (UI) Wage Record Data.

Explain how the State will meet the requirements to utilize quarterly UI wage records for performance accountability, evaluations, and as a source for workforce and labor market

information, consistent with Federal and State law. (This Operational Planning element applies to core programs.)

Privacy Safeguards.
Describe the privacy safeguards incorporated in the State's workforce development system, including safeguards required by section 444 of the General Education Provisions Act (20 U.S.C. 1232g) and other applicable Federal laws.

There are multiple state agencies in North Carolina that have administrative responsibility for the WIOA core programs. These include the North Carolina Department of Commerce, North Carolina Community College System, and North Carolina Department of Health and Human Services. While each of these entities maintain separate participant and financial information systems, the agencies have worked and continue to work collaboratively to integrate data across North Carolina's workforce development system. Each agency collects and reports their individual participant record system from their case management system and submits their required reports. The effectiveness in serving employers measures is a combined report by matching employer records using name and telephone numbers to identify common employers. NC currently has an integrated system for Title I and Title III with Geographic Solutions, and the Title IV programs have recently signed a contract with Geographic Solutions for a replacement case management system with a go-live date set for 2021. Although there will be separate instances of the Geographic Solutions system for NCWorks and Vocational Rehabilitation, the WIOA core partners will leverage having the same core system structure and data model to share and transfer information. The expectation is that data shared across agencies will be more complete and require fewer or no transformations during the ETL process.

The three agencies the administer the core WIOA programs participate in a state level longitudinal data collection system used in North Carolina along with other education and workforce programs. This Common Follow-Up System (CFS) allows N.C. to leverage its existing data collection systems and report our individual requirements needed but to have a common view of data and to show the effectiveness of all programs working together.

The NCWorks Commission uses the information from the CFS to complete its annual performance measures report. One of the indicators that is tracked for each program is continuation in higher education and/or other workforce programs. The commission reviews this information annually and reports to the N.C. General Assembly

The core WIOA agencies have different methods of accessing UI wage data including direct access to data to allow immediate reports. Agencies also use UI wage data as part of the reports produced from the Common Follow-up System.

North Carolina has a long history and wealth of experience in the analyses and use of Unemployment Insurance wage data to meet both state and federal reporting and evaluation requirements. Through the North Carolina Common Follow-up System, the state has a longitudinal repository of Unemployment Insurance data with over 17 years of historical quarterly wage records. North Carolina has recently executed the data sharing agreement to participate in State Wage Record Interchange System (SWIS). Access to NC UI wage records are completed undersigned Memoranda of Understanding which outline data sharing and confidentiality laws and requirements.

The core WIOA agencies use secure servers to access and share any data.

Programs administered through the Division of Workforce Solutions employ specific measures for privacy safeguarding by creating a unique identifier for the individual's Social Security information when registered for services. Unique identifiers are used to eliminate exposure of sensitive information through the case management and referrals processes.

Programs administered through the Division of Vocational Rehabilitation Services are regulated by the Health Insurance Portability and Accountability Act (HIPPA) and conform to all privacy safeguards therein as well as obtaining a signed release from individuals seeking services.

Workforce programs administered by the NC Community College System are regulated by the Family Educational Rights and Privacy Act (FERPA) and conform to all privacy safeguards therein.

Data from the state's unemployment insurance system used for the computation of WIOA performance measures by the Division of Workforce Solutions and the NCCCS are utilized in compliance with 20. C.F.R Part 603.

North Carolina will continue to make privacy considerations a priority in all initiatives and interfaces.

Priority of Service for Veterans.

Describe how the State will implement and monitor the priority of service provisions for veterans in accordance with the requirements of the Jobs for Veterans Act, codified at section 4215 of 38 U.S.C., which applies to all employment and training programs funded in whole or in part by the Department of Labor. States should also describe the referral process for veterans determined to have a significant barrier to employment to receive services from the Jobs for Veterans State Grants (JVSG) program's Disabled Veterans' Outreach Program (DVOP) specialist.

North Carolina's public workforce development system offers programs designed to improve employment opportunities for all customers. Services include assessments, training programs, staff- assisted services, and self-service online programs. In addition to serving people with various levels of education and work experience, some specialized programs provide customized services to special populations, especially veterans. North Carolina is home to seven military installations and over 775,000 of its citizens are veterans. Staff at NCWorks Career Centers are committed to helping veterans and other individuals with barriers to employment navigate the employment process beginning with assessment and continuing throughout the job-search and culminating in suitable employment.

On November 7, 2002, the Jobs for Veterans Act (JVA), Public Law 107-288 was signed into law. One provision of the JVA, codified at 38 U.S.C. 4215, establishes a priority of service requirement for "covered persons" (veterans and certain spouses of veterans, as defined by 38 U.S.C. 4215(a) (l) (A-B), in qualified job training programs. Qualified job training programs include all workforce programs funded directly, in whole or in part, by the US Department of Labor (USDOL), such as WIOA Title I and Title III (Wagner Peyser) employment services and other job training programs offered through competitive grants. The final rule implementing the priority of service requirement took effect on January 19, 2009 and can be found at 20 CFR 1010. Additionally, USDOL has provided policy guidance to the workforce investment system regarding the implementation of the priority of service. In brief, priority of service means that veterans and eligible spouses are given priority over non-covered persons for the receipt of employment, training, and placement services provided under a qualified job training program. A veteran or an eligible spouse either receives access to a service earlier in time than a non-covered person, or, if the resource is limited, the veteran or eligible spouse receives access to the services instead of or before the non-covered person.

It is important to note, however, that the priority of service requirements are not affected by this guidance; direct recipients of USDOL funding remain subject to the priority of service guidance and regulations.

Additionally, the priority of services requirements should not be interpreted to limit veterans and eligible spouses to receiving services only from veterans' program staff. Procedures or policies that restrict a veteran's access to WIOA Title I or Title III services, even if such restrictions are intended to provide the veteran with specialized services, are contrary to the priority of service requirement.

Priority of service provisions for veterans are monitored on a regular basis through field checks and by generating reports from NCWorks Online, the state's labor exchange portal. Additionally, North Carolina statute requires annually that a report be submitted to the NC General Assembly, in accordance with General Statute 165-44, and consistent with the federal Jobs for Veterans' Act (P.L. 107-288).

Many US military veterans complete service only to discover they cannot find jobs when they return home. Although service members develop a wide range of skills through military education, training, and experience, they often find it difficult to translate these skills into civilian jobs, perhaps because technical skills, education, and experience differ between military and civilian sectors. This is especially true for veterans with medical training such as combat medics and corpsmen.

The North Carolina Department of Commerce provides a Veteran Services Program across the state to assist veterans with employment. The Disabled Veterans' Outreach Program Specialists (DVOPs) assist veterans with overcoming barriers through intensive, career services. Local Veteran Employment Representatives (LVERs) reach out to employers to advocate for hiring Veterans. Recent changes to the federal policies concerning the roles of these staff that serve veterans have been made to ensure that eligible veterans and eligible spouses receive the best combination of services, according to their needs. The agency determined that to accomplish this refocusing, Disabled Veterans' Outreach Program (DVOP) specialists will serve only those veterans and eligible spouses most in need of the intensive career services to address significant barriers to employment. As a result, DVOP specialists will serve fewer veterans and eligible spouses, but will be able to provide more intensive services.

The current referral process is to have the veteran complete a questionnaire upon their arrival in a NCWorks Career Center. They are asked to check if they have any of the following (barriers):

- disabilities;
- homelessness;
- unemployed for at least 27 weeks;
- an offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration.
- no high school diploma or GED;
- low-income; and
- between 18-24 years old.

Veterans with any of these barriers are then referred to a DVOP, or in the limited locations without a DVOP, the veteran will be given a priority of service and will be assisted by another career center staff. Included in career counseling conversations with veterans, staff inform veterans of the Registered Apprenticeship program and the eligibility and utilization of GI Bill Benefits for the registered apprenticeship program.

Another manifestation of the priority of service policy is in the NCWorks Online job order process. This means that all registered veterans have an opportunity to view the job opening before non-veterans. To accomplish this, a 24-hour business day hold plus overnight update is placed on each job order before it is released to the general public.

The North Carolina Community College System maintains an open-door policy that emphasizes "high-quality, accessible educational opportunities that minimize barriers to post-secondary education, maximize student success, develop a globally and multi-culturally competent workforce, and improve the lives and well-being of individuals". Through the Carl Perkins V Act, the NCCCS has funded the Military Credit for Prior Learning initiative. This on-going initiative compares the military training course work with the for-credit course work in relevant program titles and awards the appropriate academic credits for the military training. This initiative provides the opportunity for veterans to receive curriculum credit for prior military experience and training. As a result, the veterans remain in the program and can complete their academic course work in less time.

The Perkins V Act also serves specific special populations. Under this Act, youth who have a parent who is a member of the armed forces or those who are on active duty are defined as a special population. This means a college may set aside funding to assist these students to achieve success in their program of study.

Several Colleges within the system offer Green Zone Training which is a professional development opportunity for college staff to receive an overview of best practices for working with military and veteran students.

Veterans with Significant Barriers to Employment (SBE):

During initial visit and registration, North Carolina's Division of Workforce Solutions (DWS) offers all veterans and eligible spouse a wide range of employment and training opportunities and services. At the time of initial registration, Disabled, Campaign Badge, Recently Separated Veterans, transitioning service members in need of intensive career services, Wounded Warriors in military treatment facilities and their family caregivers and 18-24 years old veterans are coded with a special character on their records identifying them as such. This character ensures veterans receive priority for all automated call-ins for job or program referrals, and readily identifies for enrollment in programs which eligible. Further action has been initiated and steps taken to ensure that opportunities and services are made available to veterans most in need of case management and intensive career services:

1. Every veteran on their initial visit to the America Jobs Center will be given the Veterans & Eligible Spouse Services Assessment Form by Wagner-Peyser or WIOA staff to determine if any barriers to employment exist and what, if any, intensive career services are required. Assessments are not conducted by Jobs for Veterans State Grant (JVSG) staff. If any of the questions on the assessment form are answered with an affirmative response to the SBE, the eligible veteran or spouse must be offered referral to the DVOP or other appropriate staff for further assistance.
2. Those identified as needing intensive career services are entered into case management by the Disabled Veteran Outreach Program specialist (or other local office staff if there is not a DVOP in the designated NCWorks Career Center). A plan is developed with the individual to provide, refer, and coordinate services needed with the appropriate Workforce Partners, or other agencies that provide the needed services to help the veteran mitigate their barrier to employment.
3. Wounded Warriors: Two (2) NC DVOP staff will continue with the primary duty of providing services to service members assigned to the Wounded Warriors Barracks. One DVOP is out stationed at the Camp Lejeune Marine Corps Base Wounded Warrior Barracks and the second one is stationed on Fort Bragg. These DVOP staff members will work directly with residents of the Warrior Transition Barracks at each base.
4. Chapter 31, Veterans Administration Rehabilitation & Employment (VR&E) program: In compliance with VPL 01-09 and the respective TAG, a DVOP will be designated as the State Intensive Services Coordinator (ISC). This staff primary responsibility of tracking and reporting services and outcomes for all veterans enrolled in Chapter 31 within the state. The ISC serves as the State Agency's central point of contact for service to VR&E participants. In addition to case management responsibilities, the assigned ISC will facilitate the dissemination of information to, and compile information from, the DVOP specialists or other SA staff who serve Chapter 31 participants. The ISC serves as the coordination point to communicate information to and from VR&E staff and the state Director Veterans Employment & Training (DVET).

Homeless Veterans: All DVOP staff members are involved with local civic, community, and governmental agencies involved in assisting with and eradicating the homeless situation among veterans. North Carolina has six (6) major metro areas throughout the state: Asheville, Charlotte, Greensboro, Raleigh/Durham, Fayetteville, and Wilmington where the DVOP coordinates with the local Veterans Administration, Homeless Shelters, Competitive Grantees in Asheville and in Durham/Fayetteville, surrounding America

Job Centers, Veteran Service Organizations, and Local Government to conduct Homeless Veteran Stand Down each year.
North Carolina has six (6) military facilities. DVOP staff are stationed at both Ft. Bragg and Camp Lejeune as a point of contact for referral of qualified disabled veterans. We also partner with the VA, and many other state and private companies to optimize employment opportunities for disabled veterans. The success of the JVSG Program is monitored daily by America Job Center Managers and management at all levels with the use of monthly and quarterly automated reports.

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.

Both physical and programmatic accessibility are essential for all individuals to participate in services offered by the NCWorks Career Centers and the collaborating community partners. With employment as the ultimate objective, accessibility to facilities and programs offered as legislated by the Americans with Disabilities Act is essential to support individuals with significant barriers to employment to achieve employment.

The physical accessibility of facilities is systematically addressed across the state. The State maintains a Methods of Administration which details how compliance with WIOA Section 188 will be maintained. The Methods of Administration is a "living" document which ensures current federal regulations and directives are implemented at the state and local level as quickly as possible. NCWorks Career Centers also utilize the North Carolina Department of Commerce Division of Workforce Solutions Americans with Disabilities Act (ADA) Compliance Review Checklist to ensure access to the entire range of services at each location. As a part of the certification process to become an NCWorks Career Center, each site is required to obtain a letter of ADA compliance from the host agency. ADA compliance is monitored and reviewed on an annual basis by the NC Department of Commerce and the host agency. Sites are required to maintain and update accessibility as ADA regulations are revised and NCWorks Career Center Certifications are renewed.

In partnership with Local Workforce Development Boards (WDBs), the NCWorks Commission in May 2013, established minimum certification criteria for NCWorks Career Centers to ensure consistency in quality service delivery throughout the state. The certification criteria are reevaluated with each 3 year certification cycle, the current NCWorks Career Center Certification Criteria was approved by the NCWorks Commission on May 17, 2017.

Certification criteria emphasize staff cross-training and partnerships to provide excellent service to customers. The certification process involves three steps:

1. Local workforce office submits an application demonstrating how certification criteria have been met.
2. Quality Improvement team from the Division of Workforce Solutions visits the office to observe and evaluate operations.
3. The local office receives certification upon successful evaluation.

Career Center Certification Accessibility Criteria:

- Entrance and exit must be accessible and free of obstacles with appropriate signage.
- Pedestrian routes inside the host agency facility must be accessible and free of obstacles.

- Entrance and exit doors are required to be equipped with hardware that is usable with one hand without tight grasping, pinching or twisting of the wrist.
- Furniture inside the Center must be arranged to allow wheelchair access.
- Computer and desk workstations must be wheelchair accessible.
- Restrooms must be appropriately accessible.
- Auxiliary aids and services must be available upon request as are interpreter services for ESL customers.
- Emergency drills are to be conducted annually and staff is to be provided with host agency procedures.
- Adequate accessible parking with compliant curb ramp(s) connected to the accessibility route into the Center(s). Accessible parking must be clearly marked.

NCWorks Career Centers are monitored and reviewed every three years for continued compliance with certification standards. If a center is found out of compliance, a Corrective Action plan is required, and a follow-up monitoring visit is conducted. Centers must begin immediate corrective action to achieve compliance, depending on the nature of the finding.

Per federal law, each local workforce board must appoint a local Equal Opportunity Officer who is responsible for ensuring local WIOA Section 188 compliance. Local Equal Opportunity Officers are responsible for informing senior staff of applicable federal regulations and ensuring all programs and activities are implemented in compliance. Additionally, local Equal Opportunity Officers collect and resolve local grievances and complaints as needed. They also serve as liaisons with the state's Title I-B Equal Opportunity Officer and USDOL's Civil Rights Center to remain current on regulatory updates and guidance. They are then responsible for circulating new information locally and ensuring it is properly implemented.

During program year 2019, NCWorks Career Center staff received training to follow established procedures to ensure inclusion and programmatic accessibility to center services. This training allows for staff to better understand the different types of disabilities, how to handle issues of disclosure and disability identification with sensitivity at program intake, and how to determine the most effective mix of services and referrals to make when a disability is identified. These trainings are presented by subject matter experts and include such topics as: federal, state, and local disability policies; identifying barriers/hidden disabilities; disability awareness and etiquette; website accessibility; providing reasonable accommodations; assistive technology accommodations and resources; Section 503 for federal contractors; and simulation training.

All NC Title II, Adult Education and Family Literacy Act providers describe their plan for their ability to serve eligible individuals with disability including with learning disabilities. This plan is shared with their local One-Stop. Title II providers have career pathways programs designed for students with intellectual disabilities. The NCCCS Associate Director, Disability Services supports all Title II programs in serving students with disabilities and providing guidance and professional development. All services and access to these services will be clearly defined and outlined in the One-Stop core partner MOU.

<u>Addressing the Accessibility of the One-Stop Delivery System for Individuals who are English Language Learners.</u>

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials.

North Carolina's One-Stop delivery system is able to meet the needs of our English language learners through our Limited English Proficiency (LEP) program. LEP is operated from the Division of Workforce Solutions (DWS) state office using the Applicant Services Unit and a LEP Coordinator. DWS has established

policy for providing LEP services to all customers who do not speak English as their primary language. The goal is to deliver the same level of high-quality services to all our customers, even those with LEP.

The LEP state Coordinator is responsible for the following:

- distributing policy to all One Stops or NCWorks Career Centers;
- establishing procedures for serving LEP customers;
- training new NCWorks Career Center staff and providing annual training to keep Career Center staff current on action needed to serve LEP customers ;
- providing Technical Assistance to NCWorks Career Center staff concerning serving LEP customers;
- establishing and regularly updating the LEP Directory, the directory provides a list of persons (DWS and non-DWS) who speak various languages that can be contacted for assistance with LEP customers; monitoring services provided to LEP customers; documenting and Reporting LEP services provided; and
- developing webinars outlining LEP procedures.

In addition to the state LEP Coordinator, all NCWorks Career Centers have a designated LEP Specialist who is the resource person for the center concerning steps to take when serving a LEP customer.

All NC Title II, Adult Education and Family Literacy Act providers describe their ability to be responsive to needs of English Language Learners. Programs have multilingual outreach plans and develop staff's cultural competencies. Activities Title II will collaborate with core partners to ensure English Language Learners (ELL) have access to their services:

- Title II will train One -Stop staff on their services and programs for ELL.
- One-Stops and partners will develop a tracking system to identify number of ELL accessing services, referrals and follow to ensure outreach is comprehensive.
- Title II and One Stops will revise the MOU to clearly outline access and referral process for Title II services for ELL.
- All programs offering Integrated English Literacy and Civics Education (IELCE) will outline in the MOU how core partners will refer and support ELL including the use of training vouchers for programs.

IV. COORDINATION WITH STATE PLAN PROGRAMS

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

WIOA State Steering Council:

The NCWorks Commission's 2019-2021 strategic plan provides a framework for all workforce programs in North Carolina, including, but not limited to the programs covered under WIOA. The State Steering Council also identified key actions needed to ensure coordination and alignment.

In collaboration with the NCWorks Commission, the WIOA State Steering Council, initially established in 2015 continues as a permanent cross-agency body to coordinate and align policy and ensure continued implementation of WIOA at state and local levels. The steering council will meet monthly to review progress on WIOA implementation and develop strategies for improvement. In addition, the council will assist NCWorks Commission to review state policies that may inhibit programs from fully aligning required activities. The council will plan site visits to assess coordination of services to be able to provide meaningful assessments and recommendations to the NCWorks Commission and its Governance and System Alignment committee regarding challenges and barriers to completing the work, and suggestions for new policy.

State-level coordination and alignment will continue to provide the framework, structure, and support for an integrated workforce development system, but it's local and regional activities that must truly be aligned to improve the system. The need for regional councils recognizes the uniqueness of North Carolina's regions and the need to develop and deliver services that meet these unique needs.

NC DHHS Program Coordination Activities:

Since January 2018, North Carolina Division of Social Services has been collaborating as a participant in a cohort that is sponsored by the United States Department of Agriculture. The cohort is comprised of participants of the following programs: Workforce Innovation and Opportunity Act (WIOA), Temporary Assistance to Needy Families (TANF)/Work First Program and Food and Nutrition Services Employment &Training (FNS E&T). This opportunity allows North Carolina's Employment Services Programs to collaborate to produce a sound plan for unemployed and underemployed citizens of North Carolina. As a state, the decision was made to include the Division of Vocational Rehabilitation Services (DVRS) in the cohort, since DVRS has a wide range of employment services that are needed by these underserved and underemployed individuals. To maximize the 12-week cohort period, representatives from the NC Division of Social Services and WIOA partners interfaced regularly to design an employment plan that will foster further collaboration, which in turn will lead to a dynamic, comprehensive plan in line with the NC DHHS goal of strengthening and expanding the workforce through effectively addressing the health and wellbeing of workers and their families. In addition to producing a plan for statewide implementation, the WIOA/TANF (NC Work First)/FNS E&T cohort expectation is for each participating program to include methods to leverage and braid funding to attain ultimate outcomes. To provide guidance to the work of this group, an aligned vision statement was produced. That statement is "*By July 2020, WIOA, TANF, FNS E&T and VR will leverage and integrate resources, where appropriate and applicable, to provide a network of services for citizens that will strengthen North Carolina's workforce*". Using this declaration as the goal, the State Cohort Team was able to identify three top strategies that need to be addressed; 1) interagency communication; 2) streamlining processes and removing redundancies and; 3) creating a multi-generational approach to effectively address long-term poverty. The work of this group continues in the form of the NC Employment Cohort which includes all original members and the Division of Workforce Solutions, NC Community College Systems Office and the Workforce Development Boards.

V. COMMON ASSURANCES

(for all core programs)

The Unified or Combined State Plan must include assurances that:	
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; ***PS 18-2017*** Conflict of Interest.
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; ***PS 03-2019*** Updates to Local and Regional Area Plan Instructions for PY 2019 ***PS 09-2019, Change 1*** NCWorks Career Center Memorandum of Understanding and Partner Infrastructure Funding Agreement.
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; ***PS 09-2019, Change 1*** NCWorks Career Center Memorandum of Understanding and Partner Infrastructure Funding Agreement.
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; Yes, public comment for the Plan is provided. (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, public comment for the plan is provided.
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; ***PS 20-2017, Change 1*** Financial Management Policy for Workforce Innovation and Opportunity Act Title I ***PS 21-2017*** Procurement and Contracting Policy.
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); ***PS 20-2017, Change 1*** Financial Management Policy for Workforce Innovation and Opportunity Act Title I.

7.	The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable; ***PS 07-2018*** Workforce Innovation and Opportunity Act (WIOA) Nondiscrimination/Equal Opportunity Standards and Complaint Procedures.
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; ***PS 20-2017, Change 1***Financial Management Policy for Workforce Innovation and Opportunity Act Title I, ***PS 21-2017*** Procurement and Contracting Policy.
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; ***PS 09-2019, Change 1*** NCWorks Career Center Memorandum of Understanding and Partner Infrastructure Funding Agreement.
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); ***TEGL 16-16*** On-Stop Operations Guidance for the American Job Center Network
11.	Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; ***PS 03-2017*** Priority of Service for Veterans and Eligible Spouses in all U.S. Department of Labor Job Training Programs.
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. ***PS 03-2017*** Priority of Service for Veterans and Eligible Spouses in all U.S. Department of Labor Job Training Programs.

VI. PROGRAM-SPECIFIC REQUIREMENTS: ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES UNDER TITLE I-B

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**

Regions and Local Workforce Development Areas.

Identify the regions and the local workforce development areas designated in the State.
The overlay of North Carolina's eight economic development prosperity zones shown on the map are the basis for designation of regions. The current 23 boards meet the performance and fiscal accountability criteria of the Opportunity Act and were accordingly re-designated for the initial two-year period. North Carolina began a regional approach to planning and service delivery under the Workforce Investment Act and established eight regions that most closely aligned the geography of the local workforce development areas and the Prosperity Zones. These regions were the initial regions under the Opportunity Act and may be subject to review. The regions with their constituent local workforce development areas are:

- Western Region: Southwestern, Region C, and Mountain Area WDBs;
- Northwest Region: High Country, Western Piedmont, and Region C WDBs;
- Piedmont Triad Region: Northwest Piedmont, Guilford County, Davidson Works, and Regional Partnership WDBs;
- Southwest Region: Centralina, Region C, Charlotte/Mecklenburg, and Gaston County WDBs;
- North Central Region: Kerr-Tar, Durham, Triangle South, Turning Point, Regional Partnership, and Capital Area WDBs;
- Sandhills Region: Lumber River, Cumberland County, Regional Partnership, and Triangle South WDBs;
- Northeast Region: Region Q, Northeastern, and Turning Point WDBs; and
- Southeast Region: Eastern Carolina and Cape Fear WDBs.

Describe the process used for designating local areas
The process for the initial designation of local workforce development areas in North Carolina originates from a letter of request to the Governor from the local Chief Elected Official of each potential workforce development area. The letter of request must contain the official local area name as well as the county(ies) that comprise the area. Upon receipt of the request by the Governor and review, it will be determined if the local area meets the criteria for performed successfully and sustained fiscal integrity.

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.

North Carolina's workforce system includes businesses, organizations, agencies, employed and unemployed persons, training and educational institutions, adults and youth. To enhance service to all these constituents, continued realigning workforce development planning and services with regional labor markets is both efficient and productive. Communities and regions recognize that to have successful economic development it must go hand–in–hand with a well–functioning workforce development system. North Carolina has built on several years of emphasizing the value of regional economic development efforts and worked with Local Workforce Development Boards and local elected officials to establish and enhance identification of appropriate regions and the working relationships that have been developed.

In Program Year 2014, the State determined regional configurations based on regional geography, existing workforce board structure, and labor market areas. The regional designations were discussed with local workforce board staff on numerous occasions during Program Year 2014. Each Local Workforce

Development Area submitted Local Area' Regional Plans using these designations. Each Plan was submitted with the approval of its Chief Elected Officials and followed the process established for public comment.

The Governor's NC Job Ready plan focuses on employer leadership and a strong relationship between regional economic development partners and local workforce development areas to achieve his vision for the state.

- A regional framework enables Local Workforce Areas to better align with North Carolina's regional economic development efforts;
- Identify the workforce needs of businesses, job seekers and workers, current and projected employment opportunities and job skills necessary to obtain employment;
- Address the workforce issues of businesses and individuals on a labor market basis;
- Detail coordination with community colleges and universities;
- Provide a customer-focused coordinated approach to delivery of training, employment services and economic development;
- Promote effective and efficient use of resources;
- Articulate a consistent and defined regional approach to workforce development.

Provide the appeals process relating to designation of local areas.

At the conclusion of the initial two-year designation, North Carolina conducts a review process per Section 106(b)(3) of WIOA. Along with the initial two-year designation, North Carolina has in place legal contracts with each entity known as Grant Administrative Agreements. These Agreements are between the Division of Workforce Solutions of the North Carolina Department of Commerce, as designee of the Governor of North Carolina under the Workforce Innovation and Opportunity Act of 2014 (WIOA), Public Law 113-128 and Local Grant Administrator. This Agreement is entered into to facilitate the transfer of federal funds received by the State under the Act. Unless terminated by law or one of the parties, the Agreement remains in effect year to year that the State receives funding under the Act.

Appeals are not necessarily required since at any point in time, Local Workforce Development Boards or local governmental units may request to make changes to their composition when considering the case for improved regionalism and performance simply by submitting a written request to the Division of Workforce Solutions under the signature of the requesting Chief Elected Officials and Local Workforce Development Board Directors. The Division, as the Governor's designee, will review the application along with the submitting parties and make the determination and necessary changes in boundaries and allocations should the geography of a Local Workforce Development Board go into effect.

In addition, North Carolina's annual Local Area Plan requests Local Workforce Development Boards to submit their Consortium Agreements, which was part of the formal request for Local Area designation with multi-county jurisdictions. This provides another opportunity to request a change and/or confirm the designation of the existing local area. Local Plans are written and submitted under the signature of the Chief Elected Official and Local Workforce Development Board Chair each year.

Provide the appeals process relating to determinations for infrastructure funding.

Local Workforce Boards may make a written appeal at any time; although North Carolina distributes funds promptly as required at Sec 182 (e), pending Plan approval.: The DWS policy associated with infrastructure funding is PS 09-2019, Change 1 Date: August 9, 2019.

Statewide Activities.

Provide State policies or guidance for the statewide workforce development system and for use of State funds for workforce investment activities.

Refocused Roles and Responsibilities of Jobs for Veterans State Grant Staff

To inform Workforce Development Boards (WDBs), Division of Workforce Solutions (DWS) Workforce Centers and workforce partners staff of the federally required "Refocused Roles and Responsibilities of Jobs for Veterans State Grant (JVSG) Staff (Disabled Veterans Outreach Program Specialist and Local Veterans Employment Representative)." The policy conveys duties staff are to perform and discusses the relationship of services provided by staff within the larger workforce system.

Reference Bulletin: New Roles and Responsibilities
Number: PS 07-2014 Date: July 11, 2014 Expiration date: Indefinite

On-the-Job Training (OJT) Using Workforce Innovation and Opportunity Act (WIOA) Funds
To establish and communicate updates to the policy requirements and forms for conducting OJT activities in North Carolina and to rescind DWS Policy Statement 04-2015
Number: PS 04-2015, Change 1 Date: June 17, 2019 Expiration Date: Indefinite

Non-Criminal Program Complaints
To provide Local Workforce Development Boards and other Workforce Innovation and Opportunity Act (WIOA) sub recipients the minimum standards and procedures for processing non-criminal program complaints and to rescind Local Area Issuance No. 2009-06.
Number: PS 14-2015 Date: August 14, 2015 Expiration Date: Indefinite

Incident Reporting Process
To transmit state policy, procedures, and guidance for reporting alleged or suspected program fraud or abuse of Workforce Innovation and Opportunity Act (WIOA) resources to the N.C. Division of Workforce Solutions and to rescind Local Area Issuance No. 2009-05.
Number: PS 15-2015 Date: August 14, 2015 Expiration Date: Indefinite

Refocused Roles and Responsibilities of Jobs for Veterans State Grant Staff
To inform Workforce Development Boards (WDBs), Division of Workforce Solutions (DWS) staff, NCWorks Career Center staff and workforce partners' staff of the federally required "Refocused Roles and Responsibilities of Jobs for Veterans State Grant (JVSG) Staff (Disabled Veterans Outreach Program Specialist and Local Veterans Employment Representative)." The policy conveys duties staff are to perform and discusses the relationship of services provided by staff within the larger workforce system.
Reference Bulletin: JVSG Staff Roles & Responsibilities Bulletin
Number: PS 20-2015 Date: October 23, 2015 Expiration Date: Indefinite

Consumer Choice in Selecting Training Providers
To ensure that Workforce Innovation and Opportunity Act (WIOA) consumers are positioned to make informed choices relative to training opportunities available through the eligible WIOA provider list which maintains the integrity of the WIOA system. To support a workforce system that is readily understood, accessible, and responsive to local and regional workers, job seekers, students and businesses. To ensure customers receive information on the full array of services from public and private sources.
Number: PS 21-2015 Date: October 23. 2015 Expiration Date: Indefinite

Employer Accounts and Job Order Policy
To provide guidance regarding the Division of Workforce Solutions' Employer Accounts and Job Order Policy and to rescind PS 03-2014.
Number: PS 02-2016 Date: January 26, 2016 Expiration Date: Indefinite

Requesting Dislocated Worker Contingency. Funds Available from NC's WIOA Statewide Rapid Response Allotment
To transmit policy and requirements for requesting Dislocated Worker Contingency Funds and rescind Policy Statement 06-2016.
Number: PS 06-2016, Change 1 Date: August 8, 2017 Expiration Date: Indefinite

Voluntary Transfer of Workforce Innovation and Opportunity Act (WIOA) Funds
To transmit procedures for voluntary transfers of WIOA funds between Local Workforce Development Areas and to rescind DWS Policy Statement, Number 07-2015.
Revised in Number: PS 09-2016 Date: June 27, 2016 Expiration Date: Indefinite

Funds Transfer between Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act
To issue the requirements for the transfer of local Workforce Innovation and Opportunity Act (WIOA) formula funds between Adult and Dislocated Worker Programs and to rescind DWS Policy Statement Number: PS 06-2015
Number: PS 10-2016 Date: October 26, 2016 Expiration Date: Indefinite

NCWorks Career Center Memorandum of Understanding and Partner Infrastructure Funding Agreement (IFA)
To provide guidance on the required NCWorks Career Center Memorandum of Understanding (MOU) and Partner Infrastructure Funding Agreement (IFA). RESCINDED
This policy statement updates signature pages and rescinds PS 11-2018
Number: PS 09-2019, Change 1 Date: August 9, 2019 Expiration Date: Indefinite

NCWorks Mobile Career Center No Cost Usage Agreement and Fee-for-Use Schedule
To provide updated guidance on the NCWorks Mobile Career Center's expanded no cost usage agreement and update fee-for-use schedule. To rescind DWS PS 11-2016.
Number: PS 11-2016, Change 1 Date: April 5, 2019 Expiration Date: Indefinite

Requirement for Local Workforce Development Boards to Meet or Exceed All Federal Performance Measures
To inform Local Workforce Development Boards (Boards) of the requirement that Boards must meet or exceed all of the individual Workforce Innovation and Opportunity Act Title I Youth, Adult, and Dislocated Worker federal performance measures.
Number: PS 01-2017 Date: January 17, 2017 Expiration Date: Indefinite
Guidance on Eligibility for Participation in the Workforce Innovation and Opportunity Act Title 1 Dislocated Worker Program
To provide guidance on eligibility for participation in the WIOA Title 1 Dislocated Worker Program
Number: PS 02-2017 Date: January 18, 2017 Expiration Date: Indefinite

Priority of Service for Veterans and Eligible Spouses is all U.S. Department of Labor Job Training Programs
To emphasize to staff of Local Workforce Development Boards, Division of Workforce Solutions Offices, and NCWorks Career Centers provisions of the Workforce Innovation and Opportunity Act Final Rule for Priority in all federally-funded training and employment programs as prescribed in the Jobs for Veterans Act, and to provide instruction on the implementation of the provisions. To rescind DWS Policy Statement Number PS 12-2014.
Number: PS 03-2017 Date: January 17, 2017 Expiration Date: Indefinite

Maximize Carolina Sector Grant

To update the North Carolina Department of Commerce, Division of Workforce Solutions Maximize Carolina Grants Guidelines and rescind Policy Statement number PS 04-2017. Maximize Carolina Sector Grants are to assist local Partnerships in the development and implementation of projects in targeted sectors designed to solve applicant pipeline problems related to skills gaps or workforce shortages. The grants are also intended to support or implement sector partnerships within regions and potentially be integrated with local career pathways.
Number: PS 04-2017, Change 1

WIOA Youth Formula Funds Expenditure Requirements
To inform Local Workforce Development Boards of the requirement that Boards must meet the mandated 20% Work Experience expenditure rate for local Workforce Innovation and Opportunity Act Title I Youth formula funds and the percentage of Youth formula funds used to serve out-of-school youth must be at least 75 percent.
Number: PS 06-2017 Date: March 29, 2017 Expiration date: Indefinite

Workforce Innovation and Opportunity Act (WIOA) Service Delivery Innovation Grant Guidelines
To transmit guidelines for the Workforce Innovation and Opportunity Act (WIOA) Service Delivery Innovation Grant Guidelines.
Number: PS 07-2017 Date April 3, 2017 Expiration date: Indefinite (Based on funding availability)

Electronic File Storage and Protecting Personally Identifiable Information
To provide guidance on the use of electronic file storage, protecting Personally Identifiable Information (PII) and retrieval of workforce and other federal funds' participant, program and financial documents; and to rescind Policy Statement No. 09-2013.
Number: PS 08-2017 Date: April 4, 2017 Expiration date: Indefinite

Guidance on the Provision of WIOA Work Experience Opportunities
To provide Local Workforce Development Boards (WDBs) with additional information and clarification on guidance regarding the use, documentation, and tracking of Workforce Innovation and Opportunity Act (WIOA) Title I funds in the provision of Work Experience (WEX) opportunities for youth, adult, and dislocated worker participants and rescind Policy Statement 09-2017
Number: PS 10-2017 Date: May 9, 2017 Expiration date: Indefinite

Conflict of Interest
To provide additional guidance for Policy Statement 22-2015, Procurement and Contracting. This information includes possible scenarios and exceptions from North Carolina General Statue (NCGS) 14-234.
Number: PS 11-2017 Date: May 17, 2017 Expiration date: Indefinite

Conflict of Interest Requirements for Workforce Development Boards and Staff
To inform Local Workforce Development Boards (WDBs) of the requirement to develop a Conflict of Interest Policy and provide a policy template. To rescind PS 11-2017.
Policy Statement Number18-2017 Date: November 21, 2017 Expiration Date: Indefinite

Procurement and Contracting Policy
To provide Local Workforce Development Boards (WDBs) and other sub recipients minimum standards and procedures designed to ensure the proper procurement of and contracting for services. To rescind PS 22-2015
Number: PS 21-2017 Date: November 21, 2017 Expiration Date: Indefinite

Requesting Dislocated Worker Contingency. Funds Available from NC's WIOA Statewide Rapid Response Allotment
To transmit policy and requirements for requesting Dislocated Worker Contingency Funds and rescind Policy Statement 06-2016.
Number: PS 06-2016, Change 1 Date: August 8, 2017 Expiration Date: Indefinite

Guidance for Local Incumbent Worker Training Policies
To provide WIOA guidelines according to WIOA Section 134(d)(4), to WDBs choosing to use up to 20 percent of the combined Adult and Dislocated Worker allocated formula program funds to serve Incumbent Works. To rescind PS 17-2017
Number: PS 17-2017, Change 1 Date: August 16, 2019 Expiration Date: Indefinite

Requirement for Local Workforce Development Boards to Use Competitive Selection Processes to Procure Training Providers and One-Stop Operators
To inform Local Workforce Development Boards (WDBs) of the requirement that they must use a competitive procurement process to select providers of Workforce Innovation and Opportunity Act (WIOA) Adult, Youth, and Dislocated Worker services, as well as, for the operator of a local certified NCWorks Career Center using the Workforce Innovation and Opportunity Act (WIOA) Final Regulations and to allow the one-stop operator selection process to remain up to four (4) years. To provide instructions for a waiver in the case of a failed procurement process. To rescind PS 19-2017, Change 1.
Number: PS 19-2017, Change 2 Date: July 29, 2019 Expiration date: Indefinite

Revised Local Workforce Innovation and Opportunity Act (WIOA) Workforce Development Program Year 2018 Allocations
To revise Workforce Innovation and Opportunity Act (WIOA) Program Year (PY) 2018 Local Area October Allocations.
Number: PS 04-2018, Change 1 Date: November 14, 2018 Expiration Date: June 30, 2020

Revised Local Workforce Innovation and Opportunity Act (WIOA) Workforce Development Program Year 2018 Allocations
To provide the second revision to WIOA PY2018 Allocations
Number: PS 04-2018, Change 2 Date: June 11, 2019 Expiration Date: June 30, 2020

Workforce Innovation and Opportunity Act (WIOA) Nondiscrimination/Equal Opportunity Standards and Complaint Procedures
To provide Local Areas and other sub recipients minimum standards and procedures designed to ensure that all WIOA programs will be conducted in accordance with applicable equal opportunity and nondiscrimination requirements. This policy provides current contact information and rescinds DWS Policy Statement Number 08-2014.
Number: PS 07-2018 Date: August 15, 2018 Expiration Date: Indefinite

Workforce Innovation and Opportunity Act (WIOA) Funds and Pell Grants and to Rescind DWS PS 08-2015
To provide clarification on the use of Workforce Innovation and Opportunity Act (WIOA) Title I resources when combined with Pell Grants and the Financial Award Analysis Form. This policy also rescinds PS 08-2015.

Number: PS 08-2018 Date: August 15, 2018 Expiration Date: Indefinite

Definition of WIOA's "Requires Additional Assistance for Youth Eligibility"
To provide North Carolina's definition for "requires additional assistance to complete an educational program or to secure and hold employment" as it relates to eligibility for youth at Workforce Innovation and Opportunity Act (WIOA) Sections 129 (a)(l)(B)(iii) (Vill), (a)(l)(C)(iv)(VII), (a)(3)(B), and to rescind Policy Statement 11-2015.
Number: PS 10-2018 Date: September 25, 2018 Expiration date: Indefinite

NCWorks Local Innovation Fund Grants
To announce the availability of NCWorks Local Innovation Funds Grants.
Number: PS 12-2018 Date: November 20, 2018 Expiration date: April 20, 2021

Revised Local Workforce Innovation and Opportunity Act (WIOA) Workforce Development Program Year 2019 Allocations
To revise WIOA PY 2019 Local Area October Allocations. To rescind PS 04-2019
Number: PS 04-2019, Change 1 Date: October 11, 2019 Expiration Date: June 30, 2021

Business Services Work-based Learning Position Policy and Application
To support Local Workforce Development Boards (WDBs) with funding that enhances the connection of Workforce Innovation and Opportunity Act (WIOA) work-based learning activities to business and industry, and increase the number of businesses and employers using NCWorks system services with proactive outreach to employers who can benefit from workforce solutions.
Number: PS 05-2019 Date: June 7, 2019 Expiration date: Indefinite
Finish Line Grants Operations Funds Request Form
To provide guidance and instructions to Local Workforce Development Boards on applying for Workforce Innovation and Opportunity Act Governor's Finish Line Grants Operations Funds. This Policy Statement also provides the Finish Line Grants Operations Funds Request Form. This policy statement rescinds policy statement PS 09-2018.
Number: PS 07-2019 Date: June 28, 2019 Expiration Date: 6/30/2020

Finish Line Grants Continuation Instructions and Request Form
To provide guidance and instructions to Local Workforce Development Boards and North Carolina Community Colleges on applying for Workforce Innovation and Opportunity Act Governor's Finish Line Grants Initiative. This Policy Statement also provides NCWorks Online instructions specific to the Finish Line Grants and Finish Line Grants Operations Funds Request Form.
Number: PS 08-2019 Date: June 28, 2019 Expiration date: Indefinite

2019 Lower Living Standard Income Level and to Rescind DWS Policy Statement Number 06-2018
To transmit the income chart identifying the higher of the "Federal Poverty Level Income Guidelines" and the "70% Lower Living Standard Income Level Guidelines" for the year and rescinds DWS Policy Statement Number 06-2018.
Number: PS 10-2019 Date: August 16, 2019 Expiration Date: Indefinite

Rescind Workforce Innovation and Opportunity Act (WIOA) Planning Enhancement Grant Application
To rescind the Workforce Innovation and Opportunity Act (WIOA) Planning Enhancement Grant Application PS 22-2017, Change 1.
Number: PS 11-2019 Date: October 21, 2019 Expiration Date: Until further notice

Rescind Workforce Innovation and Opportunity Act (WIOA) Program Enhancement Grant Application
To rescind the Workforce Innovation and Opportunity Act (WIOA) Program Enhancement Grant Application PS 16-2017, Change 1.
Number: PS 12-2019 Date: October 21, 2019 Expiration Date: Until further notice

> 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.

North Carolina will use state set aside funding to support the key goals and strategies laid out in NCWorks Commission's strategic plan and move forward with the Governor's Vision for workforce development.

- Sector strategies and business engagement. Funds will be available to help develop and support public-private partnership, increase number of registered apprenticeship programs, and cross-training of staff across programs.
- Work Based Learning staffing grants at the local level to enhance work experience, OJT, and related activities.
- Career center improvements. Funds will be used to update and improve outreach materials, technology upgrades, and staff training.
- Finish Line Grants to assist students with supportive services to insure they finish their credentialed coursework.
- American Job Center Network Branding to maintain compliance with US DOL outreaching criteria.

Upon receipt of any information as it pertains to a mass layoff or facility closure to include notices filed in compliance to WARN, the state Rapid Response Dislocated Worker Unit makes an initial telephone contact to the employer within 48 hours to schedule a management meeting with the employer and Chief Union Official, if applicable. The purpose of the management meeting is to develop a plan of action to ensure that workers have a smooth and successful transition into new employment through a collaborative effort of support from state, regional and local partners. Rapid Response funds are utilized at the state level. Rapid Response contingency funds are available to Workforce Development Boards to assist with a dislocation when local formula funds have been expended or obligated. The Rapid Response Dislocated Worker Unit can help prevent or avert a layoff by providing a company with an Incumbent Worker Training Grant.

> In addition, describe the State policies and procedures to provide Rapid Responses in cases of natural disasters including coordination with FEMA and other entities.

In the event of a natural disaster, the state Rapid Response Dislocated Worker Unit coordinates with USDOL Employment and Training Administration, Federal Emergency Management Agency, NC Public Safety Emergency Management Division and American Red Cross to ensure available resources are provided to dislocated workers and survivors of a natural disaster. The Unit can file a National Dislocated Worker Grant as well as provide guidance and/or financial assistance to help impacted communities in organizing support for dislocated workers and meeting the basic needs of their families. Such assistance may include providing heat, shelter, food, clothing and other necessities and services. The Unit coordinates with partner agencies to dispatch the mobile career classroom to assist survivors in locating missing family members or file a claim for Disaster Unemployment Assistance.

> 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.

The state Rapid Response Dislocated Worker Unit works closely with the state's Trade Adjustment Assistance Unit, which keeps staff apprised of new TAA petitions filed. Information on how to file a petition

for TAA is provided to all companies faced with either a mass layoff or facility closure and is part of the employer packet provided to the management team at the initial rapid response meeting. If the company is impacted due to foreign competition or discloses their plans to shift production to another country, then information on the Trade Program is shared. If the company is already certified or becomes certified for TAA while workers are still employed, then Trade orientation sessions are facilitated on–site so workers will understand the expanded benefits the Trade Program offers.

Information about Trade Act Programs is disseminated to impacted individuals in several ways. A press release is provided to the Department of Commerce Public Information Officer, which is then distributed to the appropriate media market. When a Trade petition is certified while employees are/have been released from employment, Division staff contact the trade affected employer and ask them to provide a list with contact information of their incumbent and dislocated workers. These workers are mailed a letter that outlines the types of benefits available and advises them of potential eligibility, and they are instructed to contact their local NCWorks Career Center to complete the required application. This letter includes NCWorks Career Center locations and phone numbers.

Workers are frequently co–enrolled into WIOA to receive timely and individualized career services as well as the wrap around supportive services not offered through the Trade Program.

(b) **Adult and Dislocated Worker Program Requirements**

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.

The Division of Workforce Solutions encourages Local Workforce Development Boards to utilize formula funding to fund Local Incumbent Worker training programs. Local Incumbent Worker Training (IWT) is designed to meet the special requirements of an employer (including a group of employers) to retain a skilled workforce or avert the need to lay off employees by assisting the workers in obtaining the skills necessary to retain employment.

Local Workforce Board staff guide candidate businesses in the application process, ensuring that quality training is selected to address the employees' identified skills gaps, and fits within the WIOA parameters. The application process includes validation of the trainer and asks the company to describe how the requested training will address the identified skills gaps, improve employee retention, impact company stability, and increase the competitiveness of the employee and employer.

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).

Registered Apprenticeship, Pre-apprenticeship, and related strategies operate under the name "ApprenticeshipNC " in the North Carolina Community College System, with a combination of state and regional staff. Close relationships with the Division of Workforce Solutions, NCWorks Career Centers, Community Colleges, NC Department of Public Instruction and public schools enable the program to grow and evolve.

For example, NCWorks Career Centers and the Community College System are working to develop pre-apprenticeships for local employers. The career centers will be assisting with conducting assessments, providing referrals and screening potential apprentices for pre-apprenticeship. The pre-apprenticeship will

provide pre-employment training as determined by the employer so that a talent pipeline of workers is created for employers to choose from. Those that successfully complete their pre-apprenticeship will go on to a youth apprenticeship or a registered apprenticeship. WIOA funds will be used for those eligible to assist with training needs for the apprentice.

North Carolina is also utilizing public/private partnerships to grow its registered apprenticeship programs, focusing on youth apprenticeship with sector strategies. Several of these partnerships are growing apprenticeships in advanced manufacturing; specifically, tool and die, machining and mechatronics. Another sector strategy is in the area of IT registered apprenticeships. There are approximately 10,000 unfilled IT jobs in the state and there are public/private partnerships working to form a solid and sustainable registered apprenticeship program.

Additionally, because the US Military is the second largest employer in the state, Ft. Bragg has an approved Registered Apprenticeship program to register soldiers in multiple apprentice occupations. Camp Lejeune has a pipe fitting/welder Pre-Apprenticeship program that enables Marines to receive training and at successful completion will receive credentials upon transitioning out of the service. Upon graduation of their pre-apprenticeship, the Marine transitions out of the military into civilian life with direct entry to a career with an employer to complete their registered apprenticeship. We are looking at connecting more employers to those transitioning out of the service so that more can not only receive nationally recognized credentials but have possible direct entry into employment as they exit the military.

ApprenticeshipNC is also working with several large electrical, plumbing, carpentry and masonry companies to recruit youth into these technical trade skilled careers where there are massive shortages of trained workers. The youth are enrolled into a pre-apprenticeship and upon graduation transition directly into a career with an employer to complete the registered apprenticeship. Companies also have the option of beginning with a youth apprenticeship for those that begin in high school.

Additionally, apprenticeship staff is integrated into Business Services teams, NCWorks Career Centers and Community Colleges in order to collaborate and work as an Integrated Service Delivery Team that holistically serves all of the needs of our businesses.

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).

The workforce development system, established under the Workforce Innovation and Opportunity Act (WIOA), emphasizes informed customer choice, job-driven training, provider performance, and continuous improvement. The selection of legitimate training providers and quality training programs is vital to achieving these core principles.

The United States Department of Labor (USDOL) has issued guidance that requires states to collect and report performance information on all individuals and WIOA Title I Core Program participants (of Adult, Dislocated Worker, and Youth Programs) served by each program on the state list of Eligible Training Providers (ETP List). The requirements for ETP reporting can be found in WIOA section 116(d)(4) and 116(d)(6)(B) and in the WIOA Joint & Department of Labor Only Final Rules at 20 CFR 677.230 and 20 CFR 680.490. North Carolina has requested and received a waiver from USDOL for Program Year 2018 and Program Year 2019 and has reported performance information only on individuals that are enrolled in WIOA Title I programs rather than all enrollees. If USDOL does not modify reporting requirements for Program Year 2020, North Carolina will submit another waiver request.

North Carolina is charged with ensuring that data elements related to the initial application, continued eligibility and performance information regarding approved training providers and programs are entered into the supported state system, NCWorks Online.

Training providers are initially approved to be on the state ETPL and are certified individually by each WDB to be a provider in each respective region. Hence, a training provider may be approved to be on the state ETPL, but a WDB may choose to not certify that provider or some of its training programs for its particular region.

Eligible Training Provider List (ETPL)

Training providers must be on the NC ETPL in order to be considered for WIOA Title I-B funds.

A program of training services is defined, under WIOA, as one or more courses or classes, or a structured regimen that leads to a recognized post-secondary credential, secondary school diploma or its equivalent, employment, or measurable skill gains toward such a credential or employment. These training services may be delivered in person, online, or in a blended approach.

Eligible Training Provider (ETP)

Eligible training providers (ETPs) include:

- Post-secondary education institutions;
- Registered Apprenticeship programs;
- Other public or private providers of training, which may include joint labor-management organizations and eligible providers of adult education and literacy activities under Title II, if such activities are provided in combination with occupational skills training;
- Local Boards that meet the condition set forth in WIOA Sec. 107(g)(1); and
- Community Based Organizations (CBOs) or private organizations of demonstrated effectiveness that provide training under contract with a Local Workforce Development Board (LWDB).

All eligible training providers are subject to the equal opportunity and nondiscrimination requirements set forth in WIOA Section 188.

Eligible Training Provider List Exemptions

WIOA does allow for exemptions from ETP provisions, as set forth in WIOA Title I-B Section 122. However, it is required that the training provider's basic information be entered in NCWorks Online.

Training services exempt from the ETP eligibility requirements include:

- *On-The-Job Training (OJT)* – Training by an employer that is provided to a paid participant while engaged in productive work in a job that provides knowledge and skills essential to the full and adequate performance of the job and is made available through an OJT program;
- *Customized Training – Training*:
    - That is designed to meet the specific requirements of an employer (including a group of employers);
    - That is conducted with a commitment by the employer to employ an individual upon successful completion of the training; and,
    - For which the employer:

- Pays a significant portion of the cost of training, as determined by the local board involved, taking into account the size of the employer and such other factors as the local board determines to be appropriate, which may include the number of employees participating in training, wage and benefit levels of those employees (at present and anticipated upon completion of the training), relation of the training to the competitiveness of a participant, and other employer-provided training and advancement opportunities; and
- In the case of customized training involving an employer located in multiple local areas in the State, a significant portion of the training cost, as determined by the Governor, takes into account the size of the employer and other factors as the Governor determines to be appropriate.

- *Incumbent Worker Training* – Training designed to assist workers in obtaining the skills necessary to retain employment or avert layoff;
- *Transitional Jobs* - Time-limited work experiences which are to be combined with comprehensive employment and supportive services and are to be designed to help individuals establish a work history, demonstrate success in the workplace, and develop the skills that lead to entry into and retention of unsubsidized employment;
- *Internships and Work Experience* – Planned, structured learning experience that takes place in a workplace for a limited period of time. Work experience may be paid or unpaid, as appropriate. An internship or work experience may be arranged within the private for profit sector, the non-profit sector, or the public sector.
- *Pre-Apprenticeship*- a recruitment and screening tool to ensure that a potential apprentice has the technical and professional skills necessary to perform as an apprentice and that there is a right fit for both the company and apprentice. Pre-apprenticeships are flexible in that they can be used with any recruitment pool, in any industry sector, can be paid or unpaid and may include OJL, related education or both. If the pre-apprentice is providing work for an employer through an OJL experience, they must be paid by the employer. Pre-Apprenticeship is a state recognized program that must be tied to a registered apprenticeship program.

- *Youth Apprenticeship*- a program in which the participants begin their apprenticeship or pre-apprenticeship in high school cresting a seamless transition from secondary to post-secondary placement.

- *Registered Apprenticeship*- registered Apprenticeship is a program that is developed to meet the needs of the employer and contains all required components such as, on-the-job learning, related instruction, and a progressive wage scale. The program is approved by the State Apprenticeship Agency (ApprenticeshipNC) and is recognized by USDOL. The registered apprenticeship program must follow all state and federal USDOL Apprenticeship guidelines. Upon completion apprentices receive a journey worker certificate from the USDOL and an ApprenticeshipNC certificate.
    - Instances where the Local WDB provides training services through a pay-for-performance contract; or,
    - When circumstances described at WIOA Section 134€(3)(G)(ii) occur and the Local WDB determines that:

- there are insufficient providers; or,
- there is a training services program with demonstrated effectiveness offered in the local area by a community-based organization or other private organization to serve individuals with barriers to employment;

or

- it would be most appropriate to award a contract to an institution of higher education or other eligible provider of training services in order to facilitate the training of multiple individuals in in-demand industry sectors or occupations, and such contract does not limit customer choice.

Initial Eligibility

Training provider approval and certification is a two-step process. The first step includes approval to be on the state ETPL. The second step is the designation as a Board-Certified Training Provider by the Local WDBs in their respective regions. The Local WDB has the responsibility of assisting training providers with both of these steps. The Local WDB that is located in the region with the training provider initiates approval or denial to the state ETPL and also determines whether or not a training provider and its programs will be certified in the Local Area region.

Training providers seeking initial approval to be on the state ETPL must submit their basic information via NCWorks Online in order for the WDB in that particular region to review. When granted, ETPL designation shall remain in effect on a provisional basis for one year. To remain on the ETPL after the first year, providers must submit required information, including a minimum of one year performance criteria for new training providers that have been operating for less than two years and two years of performance criteria for training provider that have been operating for more than two years.

Once ETPL approval is granted, the approval process will be required each year in order for the provider to remain on the list. Although training providers are approved to be included on the state ETPL, they must be certified by each individual WDB in order to provide training services in the individual WDB regions across North Carolina.

The NC Department of Commerce's Division of Workforce Solutions, in partnership with the Local Boards, must identify programs for inclusion on the ETPL to ensure there are sufficient numbers and types of providers serving each Local Workforce Development Area (LWDA) in a manner that maximizes customer choice.

To apply for inclusion on the ETPL, training providers must follow the process outlined in the steps listed below.

Step 1: Initial State ETPL Application

Training providers must first complete registration in NCWorks Online prior to inclusion as an eligible training provider on the State ETPL. Each question in NCWorks Online must be answered correctly and completely by the Training Provider. NCWorks Online, by internal messaging/email, will notify the Local WDB in the area where the training provider is located. It will be the Local WDB's responsibility to determine if the Training Provider is a legitimate *State Eligible Training Provider* by requiring the following basic proofs:

- College's or Company's Accreditations (national or state)
- Legitimacy of the College or Company (must include the Provider's NCID# or FEIN#)
- Most recent financial audit or financial statements for the prior 6 months
- Agreement for a drug free workplace

- General Liability Insurance

If any training provider submits a request to a WDB for approval to be added to the state ETPL, and provides the required documents, the WDB must review and make a determination on the provider's state ETPL eligibility status. The WDB shall select a profile status for each training provider seeking approval. Providers are notified via NCWorks Online regarding the status of the application.

Note: Approving public and private training providers who meet the ETP criteria is essential to providing trainees with "customer choice."

Providers and training programs that do not meet the above conditions are ineligible for inclusion on the State ETPL and should receive notification of the reason that they do not qualify to be added to the ETPL.

Out-of-State training providers may be considered at a *jobseeker's request.* The initial approval of out-of-state providers is the same as that for in-state providers, with the exception of one extra step. The out-of-state provider must also complete a verification form that must be signed by one of the authorized representatives in the provider's home state who is responsible for coordinating and managing the provider's home state WIOA Eligible Training Provider List. This signed form must be submitted to the WDB in the region in which the training provider is located.

Step 2: Training Program Approval (WDB Certification)

Once providers are activated in NCWorks Online as approved state training providers on the ETPL, each training provider's individual training programs must be certified by each WDB in order to receive WIOA funding for providing training services in the region. In order for training programs to be evaluated, the provider must have completed program descriptions in NCWorks Online for each program that it is seeking approval for. *It is up to each Local WDB's discretion to issue any additional application/ questionnaire/screening document(s), to be completed by the training provider, at this point*.

The training program should be in a career field that is "in demand" in the Local WDB's region. This ensures that the trainee has a more significant chance of gaining employment when training is complete. All Local WDBs are required to have a Local Area or Regional Occupations in Demand (OID) List and are required to update it annually with changes in their Labor Market Demand.

The training provider must provide proof of the following:

- List of partnerships with specific local area employers *(optional)*
- Proof that the training program has been in existence for one year, is preferred.

Types of Acceptable Credentials: The following are acceptable types of credentials that count toward the credential attainment indicator:

- Secondary School diploma or recognized equivalent
- Associate's degree
- Bachelor's degree
- Graduate degree for purposes of the Vocational Rehabilitation program
- Occupational licensure
- Occupational certificate, including Pre-Apprenticeship, Youth Apprenticeship and Registered Apprenticeship and Career and Technical Education educational certificates
- Occupational certification
- Other recognized certificates of industry/occupational skills completion sufficient to qualify for entry-level or advancement in employment.

The Local WDB will review and either *approve* or *deny* the provider's programs for the Local Board based on the Local Board's criteria. Program approvals for BCTPs are completed by the Local WDB switching the program "on" (under the provider certification section in NCWorks Online – click the LWIA button). Approval notifications are sent by the method in which the training provider selected when initially registering in NCWorks Online.

If all application steps are completed correctly, and the Local WDB approves, the program shall be designated as a BCTP program within thirty days of application approval. If the Local WDB has required additional forms to be completed, these forms must be submitted prior to certification as a BCTP program.

Training providers have the option to either submit the application documents electronically to the Local WDB or by mail.

Effective September 30, 2016, under WIOA, training providers that were already approved under Workforce Investment Act (WIA) guidelines had to recertify in order to remain on the ETPL. Providers were required to complete a new application and follow the Initial Eligibility process. Providers also had to update all costs and any performance information for each program that they were seeking approval. The collection of specific performance information was now required. After continued ETPL approval was granted, programs' certification would remain in effect for two years. To remain on the ETPL after the second year, providers would then have to recertify for continued eligibility and provide all required performance data for WIOA students in each of their approved programs.

All active training providers, currently on the state ETPL have been notified by their Local WDB regarding performance accountability requirements. These performance accountability requirements require that all active training providers on the ETPL provide the performance data on their WIOA participants, in order for their programs to remain on the ETPL. If a provider fails to meet performance requirements on WIOA participants, they may lose eligibility for that program in ALL local areas where the programs have been previously approved. Program recertification will be completed in the training provider's local area. All applicable appeal processes apply.

North Carolina currently has a waiver from USDOL for Program Year 2018 and Program Year 2019 and has only been required to report performance information on those individuals that are enrolled in WIOA Title I programs. However, if this waiver is not renewed or if USDOL does not change performance accountability requirements, in Program Year 2020, which begins July 1, 2020, all approved training providers on the ETPL will be required to provide performance data on **all** training participants, even if they are not enrolled in WIOA Title I programs.

For Program Years 2018 and 2019, performance information reported to USDOL has been extracted from NCWorks Online. Training providers were not required to submit any additional information to the WDBs, unless WDBs chose to have additional eligibility criteria or were unsatisfied with performance data reviewed. It is important for training providers to review the program information that has been entered in NCWorks Online to ensure it is accurate and up to date at all times.

Registered Apprenticeship (RA) programs are not subject to the same eligibility procedures for ETPL approval as in-state and out-of-state training providers. Due to the detailed application and significant vetting process with the NC Department of Commerce's Division of Workforce Solutions, the registered apprenticeship provider is not required to provide the "Initial Eligibility Application" documents to prove legitimacy for inclusion on the ETPL. However, documents for "program" approval for the registered apprenticeship training provider must be submitted to the Local Area WDB where the provider is requesting program approval.

Registered Apprenticeship training programs are subject to the same performance requirements as all other training providers approved to be on the ETPL.

For all WIOA participants receiving training provided by an ETP the following must be reported:

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

a. the percentage of individuals who are in unsubsidized employment during the second quarter after exit from the program;

b. the percentage of individuals who are in unsubsidized employment during the fourth quarter after exit from the program;

c. the median earnings of individuals who are in unsubsidized employment during the second quarter after exit from the program; and

d. the percentage of individuals who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent; during participation in or within one year after exit from the program.

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

- Describe how the State will implement and monitor the priority for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134(c)(3)(E), which applies to individualized career services and training services funded by the Adult Formula program.

The State has a process in place to ensure Adult program funds provide a priority in the delivery of career and training services to individuals who are Veterans with barriers to employment, low-income, public assistance recipients or basic skills deficient. In addition, the State requires that Workforce Development Boards describe in their annual plan a description of their priority of services processes, including any related policies, to meet priority of service requirements for Adult Training Services.

Efforts to ensure that special populations receive much needed services are addressed through North Carolina's integrated services delivery (ISD) approach. As part of ISD, community resource staff are assigned to each career center. These staff are knowledgeable of specific program(s) and work to provide services and resources such as transportation, food, housing, and training opportunities.

The State's Field Services Teams continuously monitor special population priority, for compliance, using North Carolina's management information system (MIS), NCWorks Online, along with face-to-face interviews, using a comprehensive monitoring tool.

Describe the State's criteria regarding local area transfer of funds between the adult and dislocated worker programs.

The State has implemented policy for the transfer of local WIOA funds between the Adult and Dislocated Worker funding streams. The policy establishes procedures to manage transfers and to facilitate accurate reporting to the U.S. Department of Labor. The policy dictates that while 100% transfer is allowable, local workforce development areas are reminded that appropriate services to both dislocated workers and adult customers are required. Local areas are to include rationale for requesting transfer and explanation of how services to adults and dislocated workers will be maintained, along with meeting priority of service requirements. 100% transferability gives local workforce areas:

- more flexibility to move funds where they are most needed and can provide the greatest benefit;
- ability to better respond to ongoing changes within local areas;
- increased local control over program design and delivery;
- enhanced collaboration between industry needs and worker training;
- more ability to leverage non–WIOA resources; and

- better control in the implementation of WIOA programs and services to best to meet both employer and participant need.

The State will establish criteria, issued through a North Carolina Division of Workforce Solutions Policy Statement, for determining when transfer of funds is necessary. Local Areas must submit requests via the State's online Workforce Information System Enterprise (WISE) system. Once the request has been received by the State, it will be reviewed within 5 business days to determine approval or denial of request. All requests must include the following:

- Reason for transfer request, including current service level information,
- Listing of other Local Area funding availability to serve A/DW population (i.e., NDWG, other Federal or State funding, other Special Grant funding).
- Statement that participants served with transferred funds will be subject to performance outcomes of new funding source.
- Statement that all funds transfers are subject to priority of service requirements. Upon review, Local Areas will receive written notification.

(c) **Youth Program Requirements**

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.

The NCWorks Commission supports cost-efficient, collaborative efforts that result in comprehensive and innovative services that lead youth to academic improvement, high school graduation or High School Equivalency attainment, employment, military services, advanced or pre-apprenticeship, youth apprenticeship and registered apprenticeship training, paid and unpaid internships, and/or post-secondary education. Local programs must link academic and occupational learning and develop measures of successful outcomes. Effective programs require the involvement of local groups providing input on the proposed program design and coordinating the delivery of the youth services with local employers, NCWorks Career Centers and other youth services already available in the community.

Local workforce development programs have the discretion to determine what specific program services will be provided to a youth participant, based on each participant's objective assessment and individual service strategy. Critical to the success is integrating a youth development strategy that focuses on a young person's assets, provides a variety of interventions and supports allowing the youth to grow, learn and mature— successfully transitioning to careers and productive adulthood. Youth development activities include leadership development opportunities that encourage responsibility, employability, and other positive social behaviors. It is expected that each youth will participate in more than one of the fourteen program elements required as part of any local youth program. The overall goal of the youth program is to help youth complete a high school diploma or equivalent and to prepare for a career pathway that will transition into skilled employment and/or post-secondary education.

Youth program outcomes should prepare youth for post-secondary educational opportunities, provide better linkages between academic and occupational learning, prepare youth for employment; and offer effective connections to intermediary organizations that provide strong links to the job market and employers. All youth must receive some form of follow-up services for a minimum period of 12 months, following the completion of participation in the program.

Local Workforce Development Boards will follow the procurement procedures set forth in their own local comprehensive regional plan as established by each local area to ensure proper competition and transparency.

Procurement of WIOA funded Youth Services requires the selection of youth providers through a competitive selection process. Each Local Workforce Development Board, with recommendations from its designated youth committee and in accordance with criteria outlined in the local WIOA Plan, is afforded the opportunity to identify providers of youth services that effectively address the needs of local youth.

Local Youth Committees, who serve as sub-committees to the Board, play a significant role in developing programs and services for youth. Their responsibilities include developing portions of the local plan related to eligible youth and making recommendations to Local Workforce Development Boards regarding youth service providers. As part of their local plan, each local area must have written criteria to identify effective youth activities and providers. The local Boards fund youth providers based on performance and program cost data provided by potential providers and based on criteria that may include those youth activities and providers that:

- Develop relationships between youth and caring adults
- Involve family members
- Build youth responsibility
- Develop youth citizenship and leadership skills
- Place high expectations on youth and staff
- Provide appropriate services based on age and needs of each youth
- Demonstrate involvement of the business/employer community
- Provide accessible facilities and provide accommodations for special needs populations, including individuals with disabilities
- Demonstrate prior successes in providing employment and training services to youth
- Prepare youth for success in employment
- Advocate for the youth perspective
- Demonstrate the connection between work and learning
- Provide comprehensive guidance and counseling

The criteria to solicit competitive proposals for the operation of Workforce Innovation and Opportunity Act of 2014 (WIOA) Title I, Public Law 113-128, will ensure that Youth Programs are competitively procured and solicited for comprehensive year-round Youth Programs for out-of-school youth between the ages 16-24, and in-school youth between the ages of 14 and 21. Local Areas' youth program design must offer a unique opportunity to provide a creative and innovative mix of services designed to address the academic, vocational, and employment needs of at-risk youth.

Targeted activities include:

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 post-secondary 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;
    - youth apprenticeship programs
    - registered 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 post-secondary 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 post-secondary education and training.

The Local Workforce Development Boards must comply with the most restrictive local, state, or federal regulations for the procurement process. At a minimum, the procurement process (but not inclusive) must ensure:

- Procurement follows Local Workforce Development Board written policies and procedures;
- Solicitation methods that promote fair and open competition, such as a request for proposal (RFP);
- Written code of conduct that includes arms-length negotiations, specific conflict of interest provisions to ensure those who develop or issue a proposal are separate and distinct from those who are involved in the selection process;
- Clear and accurate description of the services being procured;
- Must provide an opportunity to Small, Minority and Women's (SMW) Business' organizations and labor surplus suppliers to participate in its procurement process;
- Specific contract timeframe with the option to extend the contract for a specified period based on a provider's compliance with the terms of the contract; and
- Local Workforce Development Board shall maintain records sufficient to detail the significant history of procurement.

In addition, each Local Workforce Development Boards must use the following criteria in awarding contracts for youth services:

- Proposals must state the extent to which the organization specifically focuses on serving at-risk youth, including youth who are at risk of school dropout or at-risk of school displacement due to suspension or expulsion;
- Proposals must state whether the organization leverages community-based resources, including partnerships with organizations that provide mentoring services and private-sector employment involvement;
- Proposals must illustrate the use of an evidenced-based program model by the organization, with a proven track record of success;
- Proposals must illustrate the inclusion of rigorous, quantitative performance measures by the organization, to confirm effectiveness of the program;
- Proposals must illustrate the deployment of comprehensive support services to youth, including addressing behavioral issues, emphasizing academic and career growth, and enhancing parent and family engagement.

WIOA has established core performance indicators to ensure that Federal investments in employment and training programs are accountable to job seekers, employers, customers, and taxpayers. There is a renewed system which will ensure access for all individuals, of every skill level, the opportunity to pursue the skills, training, and education they need to obtain employment that will lead to financial stability and economic security for themselves and their families. Employers will also have the assurance that trained and qualified workers will be available to fill their current and future openings.

N.C. State WIOA Performance Indicators – (Table 1)		
Category	Measure	Description
Youth	Employment Rate – 2nd Quarter After Exit	The percentage of participants who are in education or training services, or in unsubsidized employment during the 2nd quarter after exit.
	Employment Rate – 4th Quarter After Exit	The percentage of participants who are in education or training services, or in unsubsidized employment during the 4th quarter after exit.
	Median Earnings	The median earnings of participants who are in unsubsidized employment during the 2nd quarter after exit.
	Credential Rate	The percentage of participants who obtain a recognized post-secondary credential, or a secondary school diploma or its recognized equivalent, during participation or within 1 year after exit.

Measurable Skills Gain		The percentage of participants who, during a program year, are in an education or training program that leads to a recognized post-secondary credential or employment and who are achieving measurable skill gains toward such a credential or employment.
Employers	Effectiveness in Serving Employers: Repeat Business Customers	Percentage of employers who have used WIOA core program services more than once during the last three reporting periods.
Effectiveness in Serving Employers: Employer Penetration Rate		Percentage of employers using WIOA core program services out of all employers in the State

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.

Through administrative oversight and monitoring of the 23 Local Workforce Development Boards, the state ensures local area program design incorporates the availability of all Youth Program elements. The state requires all 23 Local Workforce Development Boards to identify through Local and Regional Plan questions how the Program Elements will be made available. Once identified, as a required strategy of the individual's service strategy, whether it is by WIOA formula funds and/or through partnership, Local Workforce Development Boards must also identify the partnerships providing the service. Local areas may use WIOA youth funds to carry out the fourteen program elements either directly, in partnership, or by referral, that will assist youth in improving their educational attainment and employment opportunities.

Along with Core Partners and a variety of interested stakeholders, North Carolina plans a more cohesive partnership with the school systems' Career & Technical Education Departments, the university, and community college systems and enhanced involvement with employers to address and provide employment opportunities. It is strongly encouraged that local WIOA youth program operators have a presence within the NCWorks Career Centers as they house various partners (i.e., Vocational Rehabilitation, local Departments of Social Services, Community Colleges, and many others to include community-based organizations.) These partners may prove beneficial in addressing persons with identified and unidentified disabilities, high school equivalency credentials, leadership development and supportive service needs.

Career Pathways for youth will be of importance to occupational skills training. North Carolina will provide training through Career Pathways and Work Based Learning opportunities so that staff/partners/schools have a clear understanding of these elements and how they apply to youth. North Carolina will provide resources/training on how to assist youth to become career ready.

The State intends to achieve improved outcomes for Out of School Youth by implementing an increased focus in monitoring service providers and performance levels, and providing technical assistance to Local Workforce Development Boards. The State will increase participation in regular meetings with local area staff, Youth Leads, and service providers to offer guidance, technical assistance, and present best practices on topics which include outreach, at-risk youth, and disconnected youth, predicated on evidenced based research.

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.

In the local Comprehensive Four-Year and Regional Plan and again in subsequent Program Years, each Workforce Development Board is required to provide a detailed chart and description of how each of the required fourteen program elements will be made available to youth. Each local plan identifies how these services will be administered either through referral or through WIOA resources. Boards are required to establish procedures for the delivery of these elements in their respective local workforce development areas.

The State's program and fiscal field services teams monitor local area implementation practices, on an ongoing basis, utilizing North Carolina's management information system, NCWorks Online, in addition to other monitoring practices.

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.

In North Carolina Policy, "requires additional assistance to complete an educational program or to secure or hold employment" is defined for In-School Youth, including youth with a disability, who meet the criteria in category one.

1. In-School Youth, ages 14-21, low-income, and

a) Has poor attendance patterns in an educational program during the last 12 calendar months; or

b) Has been expelled from school within the last 12 calendar months; or

c) Has been suspended from school within the last 12 calendar months; or

d) Has below average grades of less than a "C" grade point average; or

e) Has previously been placed in out-of-home care (foster care, group home, or kinship care) for more than 6 months between the ages of 14-21; or

f) Has a currently incarcerated parent(s)/guardian.

In each local area, not more than 5% of the newly enrolled In-School Youth assisted in a given program year may be made eligible based upon WIOA Section 129(a)(3)(B) as an individual who requires additional assistance to complete an educational program or to secure or hold employment. [Section 129(a)(1)(C)(iv)(VII)]

In North Carolina, "a low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment" is defined for Out-of-School Youth, including youth with a disability, who meet the criteria in category two.

2. Out-of-School Youth, ages 16-24, low-income and

a) Has dropped out of a post-secondary educational program during the past 12 calendar months; or

b) Has a poor work history, to include no work history, or has been fired from a job in the last 6 calendar months; or

c) Has previously been placed in out-of-home care (foster care, group home, or kinship care) for more than 6 months between the ages of 16-21; or

d) Currently has an incarcerated parent(s)/guardian.

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.

North Carolina has the following law for attending school:

§ 115C-378. Children required to attend.

Every parent, guardian or other person in this State having charge or control of a child between the ages of seven and sixteen years shall cause such child to attend school continuously for a period equal to the time which the public school to which the child is assigned shall be in session.

Every parent, guardian, or other person in this State having charge or control of a child under age seven who is enrolled in a public school in grades kindergarten through two shall also cause such child to attend school continuously for a period equal to the time which the public school to which the child is assigned shall be in session unless the child has withdrawn from school.

In North Carolina, schools also include home schooling, charter schools, alternative schools and private schools.

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.

As included in WIOA Section 3(5)(B):

(5) BASIC SKILLS DEFICIENT.—The term ''basic skills deficient'' means, with respect to an individual—

- who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or
- who is a youth or adult, that the 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.

North Carolina defines "below the 8th grade level" to mean a testing score at or below 8.9. North Carolina does recognize the WIOA Title II definitions of English Language Learner (WIOA Section 203(7)), and promotes a positive and cooperative understanding of the importance of language access to federally assisted programs for limited English proficiency individuals.

(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—

Any comments from the public comment period that represent disagreement with the Plan. (WIOA section 108(d)(3).)

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).)

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).)

A description of the roles and resource contributions of the one-stop partners.

The competitive process used to award the subgrants and contracts for title I activities.

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.

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.

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.

(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:

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;

1. Statutory and/or regulatory requirements the State would like to Waive:

The North Carolina Division of Workforce Solutions (DWS) is seeking an additional waiver from the requirements outlined in the WIOA at Sections 116 and 122, and at 20 CFR 677.230 and 20 CFR 680.400 thru 680.530, which require the collection and reporting of performance related data on all students participating in training programs listed on the State's Eligible Training Providers List (ETPL). A waiver for program years 2018 and 2019 was granted previously.

Under WIOA Section 116(d)(4)(A) and 20 CFR 677.230(a)(5), Eligible Training Providers must report performance data with respect to all individuals engaging in a program of study (or the equivalent). While DWS recognizes the value and importance of monitoring provider performance, requiring ETPs to produce data on all individuals instead of just WIOA-funded participants places an undue burden on ETPs to collect, enter, and report excessive data. This is especially burdensome when ETPs have many students of whom only a small percentage are WIOA participants. The US Departments of Labor (DOL) and Education acknowledge this burden in their response to comments regarding 20 CFR 677.230 in the preamble of the WIOA Final Rule by stating, "The Departments are cognizant of the reporting burden the ETP performance report places on ETPs and do not want to place additional burden on these entities," however, there was no change to the regulatory text.

Further, ETPs and DWS are concerned that providing data on all individuals engaging in a program of study (or the equivalent) instead of WIOA-funded participants only may conflict with the Family Educational Rights and Privacy Act (FERPA), which protects the privacy of student education records. Generally, schools must have written permission from the parent or eligible student to release any information from a student's education record (34 CFR 99.30). Releasing student information on individuals who are not workforce system participants without their explicit consent may be in violation of federal law and compromise their personally identifiable information (PII). Additionally, requiring ETPs to provide data on all individuals instead of WIOA-funded participants may dissuade the institution from participating as a WIOA program provider, thereby significantly limiting consumer choice.

Under this waiver, ETPs will continue to collect and report performance data for all WIOA-funded participants in accordance with WIOA Section 116(d)(4)(A) and as specified at 20 CFR 677.230.

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

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

There are no state or local statutory or regulatory barriers to implementing the requested waiver. North Carolina regulations and policy statements are in compliance with current federal law.

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

3. State strategic goal(s) and Department of Labor priorities supported by the Waiver

(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.

This waiver aligns with DOL's policy priorities in that it connects education and training strategies by reducing the reporting burden on ETPs, thus allowing them to focus more time and resources on producing successful outcomes for WIOA-funded participants; and further protects the privacy rights of ETPs' students who are not WIOA participants.

Describes how the waiver will align with the Department's policy priorities, such as:

supporting employer engagement;
connecting education and training strategies;
supporting work-based learning;
improving job and career results, and
other guidance issued by the Department.

4. Projected programmatic outcomes resulting from implementation of the Waiver

- **Ease undue reporting burden on ETPs**
  Reporting performance data on all individuals engaging in a program of study (or the equivalent) consumes considerable time and expense. Reducing ETPs' reporting requirements to include only WIOA-funded participants would save considerable time and expense to allow ETPs to focus on education and training outcomes while still providing the required data on WIOA-funded participants.
- **Ensure protection of non-WIOA participants' PII**
  Not reporting data for individuals who are not WIOA participants would reduce ETPs' liability for potential breach of those individuals' PII.
- **Programmatic Outcomes**
  Reduction of the reporting burden on ETPs allows them to focus more time and resources on producing successful outcomes for WIOA-funded participants as well as for their non-WIOA students.

In addition, the waiver will provide the following:

- More available and varied training offerings for individuals utilizing ITAs via the public workforce system (greater customer choice).
- More training providers can lead to lower cost options.
- Greater utilization of ETPL by individuals pursing training via ITAs.

- Stronger partnerships and relationships between training providers and the public workforce system.
- Enhanced ability of local boards to respond quickly and efficiently to immediate local job seeker and employer needs.

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

5. Individuals, Groups or Populations benefiting from the Waiver

This waiver is intended to reduce the reporting burden on ETPs while still requiring them to report required performance data for all WIOA-funded participants.

Through this waiver, ETPs will be more willing to submit data on their WIOA-funded students and to remain in the ETP program, thus allowing the North Carolina workforce system to continue delivering essential training services that meet the needs of employers, job seekers, and workers.

Describes the processes used to:

Monitor the progress in implementing the waiver;
Provide notice to any local board affected by the waiver;
Provide any local board affected by the waiver an opportunity to comment on the request;
Ensure meaningful public comment, including comment by business and organized labor, on the waiver.
Collect and report information about waiver outcomes in the State's WIOA Annual Report.

6. How the State plans to Monitor Waiver Implementation, including the collection of Waiver outcome information

DWS will continue to collect data from ETPs on their WIOA-funded students and to submit that data via DWS' annual report to DOL.

North Carolina will collect and report information about waiver outcomes in the State's WIOA Annual Report.

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.

7. Assurance of State posting of the requests for public comment and notification to affected Local Workforce Development Boards

This waiver request will be included in the Unified Plan submission and subject to public comment within Plan guidelines and the WIOA requirements.

Concurrent with the submission of this waiver request, the state will notify all 23 Local Workforce Development Board directors of the state's intent of this request.

Upon approval of the previous waiver request, North Carolina issued a Policy Statement notifying all Local Workforce Development Boards that this practice would be implemented effective July 1, 2018. In addition, all current training providers were notified of this new practice.

Local Workforce Development Boards will be able to contact the Division of Workforce Solutions prior to submission of the State Unified WIOA Plan modification to discuss and have input on the waiver request. All local boards will also have access to the draft Unified Plan and opportunity to comment during the public review and comment period.

The North Carolina Division of Workforce Solutions (DWS) is seeking an additional waiver from the requirements outlined in the WIOA at Sections 116 and 122, and at 20 CFR 677.230 and 20 CFR 680.400 thru 680.530, which require the collection and reporting of performance related data on all students participating in training programs listed on the State's Eligible Training Providers List (ETPL). A waiver for program years 2018 and 2019 was granted previously.

Under WIOA Section 116(d)(4)(A) and 20 CFR 677.230(a)(5), Eligible Training Providers must report performance data with respect to all individuals engaging in a program of study (or the equivalent). While DWS recognizes the value and importance of monitoring provider performance, requiring ETPs to produce data on all individuals instead of just WIOA-funded participants places an undue burden on ETPs to collect, enter, and report excessive data. This is especially burdensome when ETPs have many students of whom only a small percentage are WIOA participants. The US Departments of Labor (DOL) and Education acknowledge this burden in their response to comments regarding 20 CFR 677.230 in the preamble of the WIOA Final Rule by stating, "The Departments are cognizant of the reporting burden the ETP performance report places on ETPs and do not want to place additional burden on these entities," however, there was no change to the regulatory text.

Further, ETPs and DWS are concerned that providing data on all individuals engaging in a program of study (or the equivalent) instead of WIOA-funded participants only may conflict with the Family Educational Rights and Privacy Act (FERPA), which protects the privacy of student education records. Generally, schools must have written permission from the parent or eligible student to release any information from a student's education record (34 CFR 99.30). Releasing student information on individuals who are not workforce system participants without their explicit consent may be in violation of federal law and compromise their personally identifiable information (PII). Additionally, requiring ETPs to provide data on all individuals instead of WIOA-funded participants may dissuade the institution from participating as a WIOA program provider, thereby significantly limiting consumer choice.

Under this waiver, ETPs will continue to collect and report performance data for all WIOA-funded participants in accordance with WIOA Section 116(d)(4)(A) and as specified at 20 CFR 677.230.

(f) **Title I-B Assurances**

The State Plan must include assurances that:	
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; **PS 03-2017** Priority of Service for Veterans and Eligible Spouses in all U.S. Department of Labor Job Training Programs
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; **PS 03-2017** Priority of Service for Veterans and Eligible Spouses in all U.S. Department of Labor Job Training Programs
3.	The State has 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; **Bylaw within PS 03-2019** Updates to Local and Regional Area Plan Instructions for PY 2019
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); **PS 03-2019** Updates to Local and Regional Area Plan Instructions for PY 2019
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, with Commission Assurance
6.	The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions; **PS 09-2019, Change 1** NCWorks Career Center Memorandum of Understand and Partner Infrastructure Funding Agreement (IFA)
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); **PS 17-2017, Change 1** Guidance for Local Incumbent Worker Training Policies **PS 04-2015, Change 1** On-the-Job (OJT) Using Workforce Innovation and Opportunity Act (WIOA) Funds
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; **PS 04-2019, Change 1** Revised Local Workforce Innovation and Opportunity Act (WIOA) Workforce Development Board PY 2019 Allocations
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; **PS 09-2019, Change 1** NCWorks Career Center Memorandum of Understand and Partner Infrastructure Funding Agreement (IFA) **PS 05-2015** Workforce Innovation and Opportunity Act (WIOA) Nondiscrimination/Equal Opportunity Standards and Complaint Procedures

10.	The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report. **The waiver provided on Eligible Training Providers regarding the reporting performance data on all individuals engaging in a program of study (or the equivalent) has relieved considerable time and expense for program managers. Reducing ETPs' reporting requirements to include only WIOA-funded participants has saved considerable time and expense to allow ETPs to focus on education and training outcomes while still providing the required data on WIOA-funded participants. Not reporting data for individuals who are not WIOA participants has reduced ETPs' liability for potential breach of those individuals' PII. Reduction of the reporting burden on ETPs allows them to focus more time and resources on producing successful outcomes for WIOA-funded participants as well as for their non-WIOA students.**
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); **PS 20-2017, Change 1** Financial Management Policy for Workforce Innovation and Opportunity Act Title I

VII. PROGRAM SPECIFIC REQUIREMENTS: WAGNER-PEYSER ACT PROGRAM

(a) Employment Service Professional Staff Development.

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.

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.

DWS will utilize professional development activities for Employment Service staff using the NCWorks Training Center whose primary mission is to provide high-quality, affordable, easily accessible training and professional development services for North Carolina's workforce system. Having a well-trained workforce development staff insures that the Governor's NC Job Ready Plan can be fully implemented.

The NCWorks Training Center achieves its mission by providing a variety of training options tailored to meet the dynamic needs of the Division of Workforce Solutions, NCWorks Career Center staff, the state's 23 Local Workforce Development Boards and staff of partner agencies. These efforts and services help ensure all staff and partners are well-trained with current skills and knowledge relevant to workforce trends. This is accomplished through workshops by professional, peer, and in-house trainers in both face- to-face sessions and online webinars and tutorials. The NCWorks Training Center also provides a vast list of supportive services including: meeting and conference preparation and planning, along with other customized event services as requested.

The NCWorks Training Center is located in a self-contained facility and boasts two well-equipped classrooms. The largest classroom can seat 42 in a traditional set-up and over 100 if set theater style with no tables. The computer lab accommodates 24 learners using laptops, which can be removed to convert to a traditional classroom. The NCWorks Training Center team is comprised of five diverse and highly skilled staff members who continually strive to stay current on workforce trends and issues at the state and national levels, and to use this knowledge to design, coordinate, plan, and facilitate training.

Records of training and events are retained and managed through the Training Registration and Information Network (TRAIN). This comprehensive system is managed by the Training Center and Division staff to collect and retain student records, maintain data for easy reporting, store student transcripts, and manage event and training self-service registration online.

The NCWorks Training Center is readily available with logistical planning of events, registration, data collection, supportive services, and training delivery. The current catalog of 82 interactive online courses successfully enhances accessibility of training on a variety of on demand topics.

Several of these courses are bundled into a product entitled *Welcome to Workforce*, which provides a structure for comprehensive system orientation and skill development over a 2-year period. This basic foundation is critical for new staff to acquire a solid understanding of the work they perform, and is also a useful refresher for more seasoned staff.

The NCWorks Training Center continues to provide workforce development professionals a globally recognized credentialing opportunity through the Facilitating Career Development (FCD) course. This 120-hour course uses the curriculum of the National Career Development Association (NCDA) curriculum and standardizes the knowledge and experience of workforce development professionals and others in career development services. The instructional format blends traditional classroom, web-based distance learning, and independent project completion. This course provides a unique opportunity for workforce

professionals from varied perspectives of the career field to network, share ideas and resources, and develop new partnerships to benefit the public. This course is offered 4-6 times per year depending on the need.

Another credentialing course available and offered as needed is the Business and Employer Services Professional (BESP) course, which is comprised of 40 hours of online work, 2 classroom days, and completion of an independent project. This course is designed for any staff in the NCWorks Career Center who interfaces with the business community and the content encourages for development of strong relationships with business, effective communication skills, and using needs assessment to determine solutions for businesses in recruiting and retaining a viable workforce. The curriculum was developed and is delivered by Lengel Vocational Services and is based on the business services competencies of the FCD course and the National Association of Workforce Development Professionals (NCWDP).

Each year, the NCWorks Training Center plans, coordinates, and hosts the NCWorks Partnership Conference. This event offers opportunities for attendees to participate in more than 60 workshops provided by professional trainers from around the country and peers from around the state. Attendees traditionally include frontline staff of NCWorks Career Centers, Workforce Board Directors and staff, private sector business representatives, staff and management of various government agencies, and non-profit organizations. The conference attendance each year averages 1,000. The theme, workshop topics, and networking activities are planned by an interagency team working together over a 10-month period and guided by the Training Center team.

The newest initiative lead by the Training Center is a comprehensive leadership development course entitled *STAR: Successful Teams Achieve Results.* The course values and structure were developed using a team of workforce professionals that included Workforce Board Directors, senior leadership at the Division, and NCWorks Career Center Managers. The first course was offered in the spring and summer of 2019, with 18 graduates who attended six 2-day sessions over a six-month period. The second class began shortly after and will graduate in November 2019 with 19 completers. Plans are underway to offer 2 courses each calendar year, with varying locations to accommodate the entire state. Currently the course is open only to existing staff of the core workforce system (Division, Workforce Boards, service contractors) who are actively supervising others. The course will begin to include aspiring managers once the majority of the current managers have participated.

Another new initiative designed to enhance accessibility to training and increase awareness of professional development opportunities is the *NCWorks Training Champions*. Each Workforce Board was given the opportunity, in collaboration with Division leadership, to identify staff of the NCWorks Career Centers to participate in the training. The training consisted of three sessions over 4 months. Participants were exposed to tools and techniques for designing training and team activities, how to access and effectively utilize existing online course options and develop their own skills as a training advocate. The 28 staff who graduated are actively encouraging staff development in their local areas, supporting their peers in professional growth, and providing the Training Center with accurate and tangible information on local training needs and preferences.

The Division of Workforce Solutions and the Division of Employment Security (DES) continue to collaborate on ways to provide significant assistance to individuals requesting help in filing for unemployment insurance compensation. In this focus on collaborative efforts, DWS, Workforce Development Boards, and DES created a joint task force to develop short range improvement goals. A major initiative derived from the task force was DES statewide unemployment insurance training of Career Center Staff: providing an overview of the unemployment insurance program, instruction on utilizing claimant databases, and processes and expectations for staff serving customers. DWS Analysts meet monthly with the DES Chief of Programs to exchange information on unemployment insurance and concerns of the Career Centers. In addition, Assistant Secretary staff from both Divisions meet quarterly to

discuss unemployment insurance policy, keep abreast of program changes and discuss concerns. Changes or corrections to unemployment insurance procedures are distributed to NCWorks Career Center staff electronically via statewide Bulletins. Individuals are instructed on how to file a claim by way of the Internet (www.des.nc.gov) or by calling the Customer Call Center (1-888-737-0259). Individuals are able to access the computers and telephones in the NCWorks Career Resource Center, with or without assistance from NCWorks Career Center staff, to file a claim.

In 2019, DES held multiple UI training sessions across the state to help NCWorks Career Center staff understand how to provide targeted UI assistance to jobseekers, and when to hand-off jobseekers with claims issues to DES for processing. Having established clearer expectations of UI assistance within Career Centers has become very beneficial to jobseekers.

Guidance and information are provided using the "North Carolina Unemployment Insurance Guide' pamphlet which includes information such as:

- How to File a Claim
- Where to call concerning claim question
- Eligibility criteria
- Where to call if I have questions regarding my appeal

Copies of the pamphlets have been shared with all the State's Local Workforce Development Boards for distribution through the NCWorks Career Centers. DES and DWS worked together to create Standard Operating Procedures (SOP) for UI processes. Additional resource materials have been provided for the sharing of information such as: poster sized flyers addressing work search tips and fraud prevention, as well as printable documents accessible through the DES website including 'Top 10 Things You Should Know When Filing Your Claim, Common Unemployment Insurance Mistakes, and How to Prevent UI Fraud

(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.**

Customers entering an NCWorks Career Center to learn about or to apply for Unemployment Insurance (UI) benefits are assisted by trained professionals. DES provided comprehensive statewide training to Career Center staff on UI and as a result are well versed in the topic and can answer general questions about the program and the level of benefits available to recipients in North Carolina. The DES UI training was recorded and is being shared via TRAIN as a continuous resource for Center staff along with FAQs developed based upon questions asked during the training sessions. DES has also developed a website robust of program information for use by Center staff as well as individuals attempting to apply for UI or learn more about UI.

Customers who wish to apply for UI are directed to the public computers in each Career Center and, if assistance is requested for any reason, including limited English proficiency, disabilities, or other barriers, staff will provide the requested assistance to the customer in completing the online application for benefits. Assistance with UI questions is also available to customers by phone. Staff are also available to help connect customers with the UI call center operated by the Division of Employment Security, the state's administrator of UI. Call center staff will answer very specific questions concerning individual claims and their benefits. Certain staff within the DWS hierarchy have also been provided with additional application accesses to resolve certain technical issues and address claims issues or request expediting as needed.

(c) **Describe the State's strategy for providing reemployment assistance to UI claimants and other unemployed individuals.**

Labor exchange services are provided to unemployment insurance claimants when they report for their reemployment appointment. Each claimant is notified by mail of a specific mandatory reemployment appointment and to report to their nearest NCWorks Career Center. Included with each appointment notice is an additional blank Work Search log and Work Search guidelines. During this appointment claimants receive an orientation of employment services to provide an awareness of services offered, new customers visiting a NCWorks Career Center receive the same orientation of employment services provided to UI claimants. This is essential in allowing all customers to take advantage of services he/she views as beneficial. The employment services orientation combined with an employability and skills assessment conducted by career center staff ensures customers benefit from Governor Roy Cooper's initiative "NC Job Ready", a holistic approach to providing a better trained workforce for employers and providing new work opportunities for job seekers. Labor exchange services are also extended to claimants through the mandatory registration in NCWorks Online. This ensures that claimants are registered for work. Through the job matching system, assistance is provided to find employment. Employers registered in NCWorks Online have access to the claimants resume and qualifications.

During the reemployment visit, the NCWorks Career Center staff determines if claimants are meeting the work test requirements. The requirements include: 1) the claimant is out of work due to no fault of their own; 2) the claimant has not returned to work; and 3) the claimant is able, available and actively seeking employment. If appropriate during this visit, staff discuss job referrals, Job Development Contacts (JDCs), referrals to workshops (e.g. resume writing, job seeking skills, keeping a job, etc.) and look for opportunities to make referrals for applicable training programs.

(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;
2. Registration of UI claimants with the State's employment service if required by State law;
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
4. Provision of referrals to and application assistance for training and education programs and resources.

The Division of Workforce Solutions and the Division of Employment Security, which administers the Unemployment Insurance (UI) program, work very closely together to meet the employment needs of UI recipients. As described in questions (b) and (c) above, Wagner-Peyser funded staff, (WIOA Title I funded staff or partner staff in select areas) in NCWorks Career Centers meet face-to-face with UI recipients within the first four weeks of receiving benefits, document that they are registered for work, review their job search activities, and make referrals to available jobs or WIOA Title I training, if appropriate. If the claimant has not complied with the Work Search and Claims Filing requirements, the Division of Employment Security is notified of the non-compliance and the case is referred for adjudication.

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—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.

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.
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 consider 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.

Assessment of Agricultural Activity in North Carolina

(1) North Carolina is a farm labor demand state. The following are its five most labor-intensive crops:

- Tobacco (July, Aug., Sept., Oct. Nov.) – Statewide
- Sweet Potato (May, Aug., Sept., Oct., Nov.) – Northeast, Southeast, Piedmont
- Blueberry (May, June, July) – Southeast
- Hemp (May through Nov.) – Statewide
- Christmas Tree (Feb. through Dec.) – Western

The following factors are affecting agriculture in the state:

The effects of more frequent and intense hurricanes, flooding, extreme temperatures, droughts, saltwater intrusion, and beach erosion have already impacted and will continue to impact North Carolina's economy and agriculture production.

- With land use practices changing due to our state becoming more urbanized and with the cost of land increasing, many farmers are being forced to sell their land and are losing their rented land to development/urban sprawl.

- The production of hemp has proven to be ideal for North Carolina due to its excellent climate and soil. Hemp has a chance to replace some (or possibly all) of losses in tobacco production; however, there are some uncertainties with the crop. It does not have great crop insurance as tobacco, resulting in farmers potentially losing more money, and the markets are very uncertain. Also, it is very likely that North Carolina will experience over production of this crop, but hemp could be one

of our top crops if there is more promotion and exploration for its other uses, such as in fiber and food.

Assessment of the Unique Needs of Farmworkers

Migrant and Seasonal Farmworkers (MSFWs) generally live in rural, isolated areas throughout North Carolina. Approximately 95 percent are of Hispanic/Latino origin; many are primarily monolingual in Spanish; and more than 50 percent are from Mexico. These farmworkers have several obstacles to employment which include transportation, childcare, limited English-speaking abilities and education, and job training. All of these barriers are major reasons for their lack of economic mobility. North Carolina has an estimated 80,000 farmworkers during peak harvest season.

• 27,605 are Migrant Farmworkers

• 18,785 are Seasonal Farmworkers

• 10,145 are farmworkers who work more than 150 days (year round)

• 21,915 are H-2A foreign farmworkers

The DWS and Telamon Corporation (NFJP Grantee) plan to continue assisting farmworkers and their families by consolidating outreach programs that provide crucially needed core and intensive services in mostly rural areas where the majority of farmworkers live and work.

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:

- Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices.
- Providing technical assistance to outreach workers. 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 complaint system, 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.
- Increasing outreach worker training and awareness across core programs including the Unemployment Insurance (UI) program and the training on identification of UI eligibility issues.
- Providing State merit staff outreach workers professional development activities to ensure they are able to provide high quality services to both jobseekers and employers.
- Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups.

(A) Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices.

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 contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices:

- The outreach efforts as required by 20 CFR 653.107 (b) (2) will be conducted by permanent and temporary outreach staff members through personal contact. Outreach workers will report to agricultural field supervisors who will have primary responsibility for ensuring accomplishments of outreach goals. North Carolina is divided into four regions: Southeast, Northeast, Piedmont and Western. Each region has one field supervisor and four permanent agriculture employment consultants. In addition, four to six temporary outreach workers are hired during the peak harvest seasons to supplement outreach activities in areas with the highest concentration of MSFWs.

DWS will continue to promote an aggressive outreach program. MSFWs will be contacted throughout North Carolina and be offered a full range of employment and training services to the extent that staff funding will allow.

- Services will continue to be delivered with particular outreach priority in NCWorks Career Center areas with high concentrations of MSFWs.

The following NCWorks Career Centers have been designated as MSFW Significant: Clayton, Clinton, Kenansville, Lumberton, North Wilkesboro, and Wilson.

The Agricultural Employment Services program of the North Carolina Department of Commerce, Division of Workforce Solution (DWS) is committed to serving the agricultural industry in the state by recruiting North Carolinians for agricultural job openings, with the goal of full utilization of all local and intrastate (within North Carolina) workers whom desire agricultural employment. Serving the agricultural industry is part of Governor Cooper's NC Job Ready Plan. As needed, interstate or migrant farmworkers and H-2A temporary foreign guest workers are brought in using the Agricultural Recruitment System (ARS) to supplement the existing agricultural workforce. Local seasonal and year-round farmworkers are permanent customers whom DWS staff members serve throughout the year. Migrant and H-2A workers will be in North Carolina in varying numbers throughout much of the year, primarily for harvest operations. Additionally, migrant farmworkers are brought in to supplement local workers in transplanting operations.

(B) Providing technical assistance to outreach workers. 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 complaint system, 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.

In compliance with Federal Regulations 20 CFR 653.107, 653.113, 655 Subpart B and 658 Subpart B, training for outreach worker activities will be provided by the following Wagner-Peyser funded staff: agricultural field supervisors, agricultural employment consultants, and the state monitor advocate.

Training will consist of basic orientation to the full range of employment services: Unemployment Insurance (UI) program, application and job order-taking, recruitment and referral procedures, complaint processing procedures, recognition of apparent violations, farmworkers' rights, supportive services, coordination of outreach efforts with other community-based organizations, completion of outreach logs and reports, and MSFWs' contacts. Outreach staff will also receive training in PC usage so that they will be able to access DWS automated services via desktop or laptop computers. The state monitor advocate will perform a general review of the training provided, with special emphasis on the portion of the training that deals with processing complaints and apparent violations.

(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.

Annual training is conducted for all permanent and temporary outreach workers on all workforce programs and for additional required training. This training includes outreach safety, migrant housing, field checks, Employment Service and Employment-Related Law Complaint System, human trafficking, farmworkers' rights, Unemployment Insurance (UI) Disaster Unemployment Assistance (DUA), Prevailing Practice and Prevailing Wage Surveys, and MSFW registrations.

(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.

Outreach workers report to agricultural field supervisors who have primary responsibility for ensuring accomplishments of outreach goals. Through improved reporting practices, better local office coordination of time, and more flexibility by management in assignment of outreach duties, outreach will be conducted through personal contact. Outreach workers, as well as other staff, will visit living areas, work sites, and gathering areas to explain the full range of services provided by the DWS and other agencies. Unemployed and underemployed farmworkers will be advised of agricultural and nonagricultural job opportunities. Outreach workers will provide information and referrals to MSFWs to supportive services, as well as assist them in securing aid such as food stamps, clothing, blankets, hygiene kits, and migrant shelter, when needed.

(E) Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups.

DWS works closely with other agencies concerned with the needs of MSFWs to coordinate the provision of referral services to these agencies. Copies of the AOP will be provided, upon request, to agencies concerned with the needs of MSFWs. In addition, DWS partners with Telamon to strengthen the ability of eligible MSFWs and their dependents to obtain or retain employment, stabilize their employment, and achieve economic self-sufficiency.

<u>Services provided to farmworkers and agricultural employers through the one-stop delivery system.</u>

Describe the State agency's proposed strategies for:

- 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:
- How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers;
- How the State serves agricultural employers and how it intends to improve such services.
    - Marketing the employment service complaint system to farmworkers and other farmworker advocacy groups.
    - Marketing the Agricultural Recruitment System to agricultural employers and how it intends to improve such publicity.

Services provided to farmworkers and agricultural employers through the one-stop delivery system. Describe the State agency's proposed strategies for:

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

All NCWorks Career Centers provide core, intensive employment and training services. Staff will determine the service needs of the MSFW customers and either provide those services or direct these customers to staff who can provide the needed services. Agricultural employment consultants and temporary agricultural outreach specialists will be strategically assigned to NCWorks Career Centers for the purpose of providing employment and training services to both agricultural employers and MSFWs. Training will be provided to NCWorks Career Center staff where no agricultural employment consultant/outreach staff are assigned to serve the MSFW population.

This includes:

- How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers;

Outreach workers will locate and contact MSFWs who are not being reached by the normal intake activities conducted by NCWorks Career Centers. Outreach workers will visit working, living, or gathering areas and explain the following services available through NCWorks Career Centers in a language understood by them: availability of referrals to training, supportive services, career services, employment opportunities, information on the Employment Service and Employment-related Law Complaint System, information on the other organizations serving MSFWs, and a basic summary of farmworkers' rights. Outreach workers will then encourage MSFWs to visit their local NCWorks Career Centers to obtain the full range of employment and training services.

- How the State serves agricultural employers and how it intends to improve such services.

Agricultural services staff members reach out to agricultural employers in rural areas throughout North Carolina, assisting them in their pursuit of agricultural workers. Agricultural employers who are expected to hire MSFWs will be identified through coordination with various providers of workforce development services. Services to these employers will be marketed by performing the following activities: conducting employer visits, promotional telephone contacts, and staff participation in growers' meetings and training

seminars, workshops and conferences. Staff will continue to organize Farm Labor Contractor Workshops in collaboration with the US DOL Wage & Hour Division, North Carolina Department of Labor, and the North Carolina Cooperative Extension to educate, train, and assist farm labor contractors on compliance with various state and federal regulations.

- Marketing the employment service complaint system to farmworkers and other farmworker advocacy groups.

The Employment Service and Employment-Related Law Complaint System is marketed to farmworkers and farmworker advocacy groups in the following manner: through presentations at different community events, conferences, workshops, farmworkers' worksites and living areas.

- Marketing the Agricultural Recruitment System to agricultural employers and how it intends to improve such publicity.

The Agricultural Recruitment System will be marketed to agricultural employers through presentations at GAP (Good Agricultural Practices) events, by posting farm work available posters in English and Spanish, and performing outreach. Outreach staff will conduct employer visits and will be involved in continuous recruitment efforts for local, interstate, and intrastate farmworkers. As funds allow, all media, including Hispanic radio, TV, and newspapers, will be utilized to ensure positive recruitment of agricultural workers. Brochures will also be distributed in Spanish and English in public-gathering places.

Other Requirements.

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).

DWS Collaborative Agreements and Efforts Description:

- A Memorandum of Understanding was entered with Telamon to establish protocols for cooperatively serving the MSFW population in North Carolina.
- A Memorandum of Understanding was entered with the U.S. DOL Wage & Hour Division to form a partnership to more effectively and efficiently communicate and cooperate on areas of common interest, including training materials, providing employers and employees with compliance assistance information, and sharing information, as appropriate.
- The DWS serves as an advisory member of the Farm Labor Practices Group (FLPG). The FLPG is a multi-sector diverse group of businesses, grower groups, advocacy organizations, and government entities which serve as: a facilitated forum for learning about farm labor issues from the diverse perspective of members; an opportunity to deepen mutual understanding and build productive new relationships through informal discussions with other members; an opportunity for members to work collaboratively to address farm labor challenges of mutual interest; and a means to offer constructive support to growers and farmworkers.
- DWS also collaborates with GAP Connections and the North Carolina Cooperative Extension service agencies. The agricultural services outreach staff participates in Farm Safety & Compliance events and Farm Labor Contractor Workshops. These events provide the opportunity for both employer and farmworkers to be informed and educated on a variety of topics including common violations, migrant housing, field sanitation, green tobacco sickness, heat stress, basic first aid and CPR, H-2A clearance orders, farm labor contractor registrations, pesticide safety, and human trafficking. In

addition, training on compliance topics such as labor laws, worker rights, and harassment are included.

- DWS is a member of the North Carolina Agricultural Stakeholders Text Tree Meteorological Disaster Preparedness. This group has been assembled to assist vulnerable worker populations in North Carolina in the event of an impending meteorological disaster.
- DWS is in the process of establishing a Memorandum of Understanding (MOU) with the North Carolina Department of Labor (NCDOL). This is to set forth the principles of the working relationship which establishes general procedures for cooperation between the two agencies in order to ensure effective preoccupancy inspections and to eliminate duplication of efforts. Specifically, this MOU will establish a process and framework to: 1) train DWS inspection personnel to conduct preoccupancy inspections of migrant housing; 2) establish procedures for DWS personnel to complete and submit reports related to preoccupancy inspections of migrant housing; and 3) institute new procedures for reimbursing NCDOC for a portion of the cost associated with DWS personnel conducting preoccupancy inspections of migrant housing.

The State Workforce agency intends to continue collaboration with existing partners and to establish new partners over the next four years. We will continue to participate and collaborate with other service agency by providing presentations, coordination of outreach efforts when possible, and participating in public meetings, conferences, and workshops to better serve the agricultural population in our state.

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 DWS solicited information and suggestions from public agencies, employer organizations, and other interested groups. Comments, feedback, and suggestions will be requested from the following agencies:

North Carolina Department of Agriculture

North Carolina Department of Labor Agricultural Safety and Health

North Carolina Migrant Education

Telamon Corporation

Farm Bureau Federation of North Carolina

Governor's Council for Hispanic/Latino Affairs

North Carolina Cooperative Extension Services

Legal Services of North Carolina, Farmworker Unit

Farmworker Advocacy Network (FAN)

North Carolina Agromedicine Institute

US Department of Labor Wage & Hour Division

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

DWS has successfully provided quantitatively proportionate services as compared to the general population and continues to meet the MSFW equity ratio indicators and minimum service level indicators as required by the US DOL at 20 CFR 653.109. The statewide MSFW Service Level Indicators report for the past four years show compliance with all equity ratio indicators and two of three minimum-service level indicators.

Total active MSFW applications – 11, 323

Referred to employment – 7,140

Placed in Jobs – 4,595

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.

DWS successfully collaborated with other service providers and adhered to the requirements of WIOA and the Wagner-Peyser Act at sections 20 CFR, parts 651, 652, 653, 655, and 658. As such, MSFWs were offered and provided the full array of employment and training services equitable and quantitatively comparable to that offered and provided to non-MSFWs. Outreach activities were conducted statewide by 16 agricultural employment consultants, as well as four temporarily funded MSFW outreach staff who were bilingual in English/Spanish. These staff members were co-funded through an ongoing and very successful cooperative outreach service agreement between DWS and Telamon.

In the last four years, H-2A Foreign Labor Certification program activities have increased. Each year agricultural employers have requested more than 20,000 foreign workers to fill temporary agricultural job openings. The increase usage of this program has been a challenge for outreach staff to meet job placement goals. The number of MSFWs has slightly decreased while the number of foreign workers continues to increase. As noted in Gov. Roy Cooper's Job Ready Initiative, DWS will focus on creating strategies and solutions to current challenges, and recruit more MSFWs, placing emphasis on job placement in both agricultural and nonagricultural industries. For many years, DWS has focused on recruitment for labor intensive crops; however, with changes/updates made by the US DOL to the definition of agriculture, DWS will expand recruitment efforts in other areas of the agriculture industry, such as pine straw, reforestation, hog, chicken, dairy farms, greenhouses and nurseries, beekeeping, hemp farms, construction on farm sites, and other work activities that are incidental to farm work.

State Monitor Advocate. The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

The State Monitor Advocate (SMA) submits his recommendations concerning the DWS 2020 Agricultural Outreach Plan in accordance with federal regulation section 20 CFR 653.107(c)(1)(v).

The SMA has reviewed and approved the AOP and has offered valuable suggestions, which will be incorporated into the final AOP. In the last three years, the previous SMA and the current SMA conducted more in-depth onsite reviews. The SMA utilized a monitoring guide questionnaire that was created to interview various career center staff members in order to measure their knowledge and to recognize where training was needed. In addition, the SMA and the program manager created training focused on the Complaint System that was presented specifically to career center managers who then assigned complaint specialists and backups. This training was conducted statewide giving exposure to the Monitor Advocate System and the Agricultural Services Program. Upon completion of the training, it was noted that career centers were capturing and recording more complaints statewide.

The SMA will continue to conduct onsite reviews at the MSFW significant offices, but will also perform onsite reviews at career centers with permanent outreach staff. The monitoring guide will also be updated and modified to better fit changes in the program and in the state. The SMA will continue to review the delivery of services to MSFWs and provide training and technical assistance, as needed. The SMA and outreach staff will continue to provide training on the Complaint System statewide on an as-needed basis or when requested.

(e) **Wagner-Peyser Assurances**

The State Plan must include assurances that:	
1.	The Wagner-Peyser 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)); DWS Wagner-Peyser Employment Service is co-located with one-stop centers to comply with requirements
2.	The State agency is complying with the requirements under 20 CFR 653.111 (State agency staffing requirements) if the State has significant MSFW one-stop centers; To comply with the requirements under 20 CFR 653.111 (state agency staffing requirements), 16 NCWorks Career Centers have permanent outreach staff, and six temporary outreach staff are hired during peak harvest seasons to supplement outreach activities in areas with high concentrations of MSFWs. Six offices have been designated as MSFW Significant offices.
3.	If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I; DWS and Workforce Development Boards across the state collaborate to administer Wagner-Peyser services, Adult and Dislocated Worker Programs, and Youth Programs under Title I.
4.	State agency merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in accordance with Department of Labor regulations. DWS provides Wagner-Peyser Act-funded labor exchange activities in accordance with these US DOL regulations.

VIII. ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM

The Unified or Combined State Plan must include a description of the following as it pertains to adult education and literacy programs and activities under title II of WIOA, the Adult Education and Family Literacy Act (AEFLA).

(a) Aligning of Content Standards.

Describe how the eligible agency has aligned its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

The state of North Carolina adopted the North Carolina Community College System College and Career Readiness Adult Education Standards in 2010. In April 2013, when the Office of Career, Technical, and Adult Education (OCTAE) introduced the College and Career Readiness Standards for Adult Education, the NCCCS College and Career Readiness Adult Education Standards were reviewed and aligned to reflect the new OCTAE standards. At that time the standards were renamed The NCCC Adult Education Content Standards (NCCCAECS). NC will continue to require that all adult education instruction be aligned to the NCCC Adult Education Content Standards through 2024.

NC requires that English language instruction be informed by the OCTAE English Language Proficiency Standards for Adult Education (ELPS). The ELPS outline language demands across academic areas that must be developed for success in postsecondary and occupational training.

Currently, adult basic education and English language instructors can earn an adult education teaching credential through participation in professional development programs provided as part of the NC Core Credential in Adult Education through Appalachian State University or the NC ESL Fast Track Credential provided through Central Piedmont Community College. All NC instructional credentials are aligned to the NCCCAECS and/or the ELPS.

The NC ESL Fast Track Credential was revised in July 2018 to include instruction on the best practices of aligning ELL lesson plans to the ELPS.

NC will continue to provide standards-based instructional professional development credentials aligned to the NCCCAECS and ELPS. The NCCC CCR Department, in collaboration with the NCCC Virtual Learning Community (VLC), is in the process of creating self-directed and facilitated online professional development modules that will lead to both Adult Education and ELL teaching credentials.

NC is in the process of rolling out a new initiative designed to ensure that all adult ed instructors are utilizing best practices and aligning the content of their lessons to the NCCAECS and ELPS. Each provider will have a Professional Development Facilitator (PDF). Each local PDF will be chosen with the approval of the state office and will be trained in best practices for aligning all instruction to the NCCAECS and ELPS. PDFs will also be trained to focus their professional development efforts on implementing IETs across the state. In order to provide continuous support, providers serving English language learners will be required to have an ELPS professional development facilitator, and providers serving ABE students will be required to have a NCCCAECS professional development facilitator. Many programs in NC will have both an ELL and ABE PDF.

As part of the NCCCS Title II program monitoring process, all providers will be required to provide lesson plans demonstrating alignment to the NCCAECS and ELPS.

The NCCCAECS are currently housed on the Appalachian State University Adult Basic Skills Professional Development (ABSPD) website: http://www.abspd.appstate.edu. Currently, NC is migrating all Core Credential Training to NCCCS office Virtual Learning Community, a project supported by NCCCS. The training will be updated and modified to be delivered completely online.

(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.

The NC Community College System (NCCCS), College and Career Readiness (CCR) office is the State's agency for managing funding provided through the Adult Education and Family Literacy Act (AEFLA). NCCCS will allocate AEFLA funds for multiyear awards for three years with a re-application process for continued funding in year two and three for grantees who meet state negotiated performance outcomes.

The NCCCS will require all eligible providers' use the same application process for sections 231, 225, and 243. All three programs will use the same grant application and process. Funds will be allocated through a competitive Request for Proposal (RFP) to eligible providers who may be the following but not limited to: 1. Local educational agencies, 2. Community-based organizations or faith-based organizations, 3. Volunteer literacy organizations, 4. Institutions of higher education, 5. Public or private nonprofit agencies, Libraries, 6. Public housing authorities 7. Nonprofit institutions that are not described in any of the above and have

the ability to provide adult education and literacy activities to eligible individuals 8. Consortia or coalitions of the agencies, organizations, institutions, libraries, or authorities described above, and 9. Partnerships between an employer and an entity described above.

NC Community College System, College and Career Readiness Program (CCR), Adult Education and Family Literacy Act, Title II prepares adults, functioning below post-secondary level, with the academic knowledge, workplace readiness skills, and post-secondary transition skills required to earn credentials in a career pathway and lead to employment with family sustaining wages. NC CCR will fund eligible providers through a competitive Request for Proposal process to implement the following activities:

- Adult Education and Literacy services that increase an individual's ability to read, write and speak in English and perform mathematics or other activities necessary for attainment of a secondary school diploma or its recognized equipment: transition to postsecondary education and training and obtain employment.
- English Language Acquisition (ELA) program to assist immigrants and other individuals who are English language learners in–– (A) improving their–– (i) reading, writing, speaking, and comprehension skills in English; and (ii) mathematics skills; and (B) acquiring an understanding of the American system of Government, individual freedom, and the responsibilities of citizenship.
- Workplace Adult Education and Literacy Activities offered in collaboration with an employer or employee organization at a workplace or an off–site location that are designed to provide adult education and literacy activities to improve the productivity of the workforce.
- Family Literacy programs that are of sufficient intensity and quality, to make sustainable improvements in the economic prospects for a family and that better enable parents or family members to support their children's learning needs, and that integrate all of the following activities: (a) Parent or family adult education and literacy activities that lead to readiness for postsecondary education or training, career advancement, and economic self–sufficiency; (b) Interactive literacy activities between parents or family members and their children; (c) Training for parents or family members regarding how to be the primary teacher for their children and full partners in the education of their children; and (d) An age–appropriate education to prepare children for success in school and life experiences.
- Correctional Education programs offer education services to criminal offenders in correctional institutions and for other institutionalized individuals. Allowable programming includes -adult education and literacy activities; - integrated education and training; - transition to re–entry initiatives and other post–release services with the goal of reducing recidivism. Priority of services will be given to individuals who are likely to leave the correctional institution within 5 years of participation in the program.
- Integrated Education and Training service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement.
- Integrated English Literacy and Civics Education means education services provided to English language learners who are adults, including professionals with degrees and credentials in their native countries that enable such adults 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. Such services shall include instruction in literacy and English language acquisition and instruction on the rights and

responsibilities of citizenship and civic participation, and must include Integrated Education and Training.

NCCCS, CCR will allocate AEFLA funds for multiyear awards for three years with a re-application process for continued funding in year two and three for grantees who have met the state's negotiated performance outcomes and are in good standing. The NCCCS will compete funds for sections 231, 225, and 243. NCCCS office has a formal RFP process that ensures all eligible providers have direct and equitable access to apply for grant and contract (section 231(c)(1) of WIOA 34 CFR. All three fund awards will use the same grant application and process. The RPF process includes screening for demonstrated past effectiveness. It also includes a process for local board review to determine whether they are consistent with the approved local plan (section 107(d)(11)(B)(i)(I) of WIOA and 34 CFR. The Local Board will make recommendations to the eligible agency to promote alignment with the approved local plan (section 107(d)(11)(B)(i)(II) of WIOA and 34 CFR. Per Section 231(e) of WIOA, the application will require a description of program design and implementation based on the 13 considerations and a description of how the plan is aligned to their Local Workforce Development Board. The 13 considerations are listed below: (1) the degree to which the eligible provider would be responsive to–– (A) regional needs as identified in the local plan under section 108; 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–– (i) who have low levels of literacy skills; or (ii) 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 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) the extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan under section 108, 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 education in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance; (8) whether the eligible provider's activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self–sufficiency, and to exercise the rights and responsibilities of citizenship; (9) whether the eligible provider's activities are delivered by 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 elementary schools and secondary schools, 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 (consistent with section 116) 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.

(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 North Carolina Department of Public Safety housed 37,104 individuals on June 30, 2018, as reported on the Prison Month End Population table http://randp.doc.state.nc.us/kimdocs/0003560.htm. Approximately 34% of those adults lack a high school diploma, or a high school equivalency credential, or score below the sixth-grade level on either the reading or math NRS approved assessment.

North Carolina Community College System's strategic plan incorporates Economic and Workforce Impact in serving the citizens of North Carolina citizens by ensuring that the educational pipeline prepares a workforce possessing the interest, knowledge, skills, and abilities to meet the needs of employers, now and into the future. College and Career Readiness (CCR), Title II will collaborate with NCCCS to create pipelines for justice involved students who are within 5 years of release.

Sixty percent of North Carolina's literacy providers offer basic skills instruction in 64 NC Department of Public Safety (NCDPS) adult correctional facilities as well as in local detention centers, jails, and youth development centers. One way to gain understanding and resources and to develop partnerships to serve justice-involved students is through the North Carolina's Governor's State Reentry Council Collaborative (SRCC). Since its inception in 2017, the North Carolina Community College System has provided a minimum of two representatives who serve on the Council which actively works with community and faith-based organizations, law enforcement, workforce commissions, business, health and human services, government agencies and formerly incarcerated individuals to study the needs of recently released individuals. In 2018, the SRCC Council made recommendations to the North Carolina Joint Legislative Oversight Committee on Justice and Public Safety and is currently implementing those recommendations into effective strategies for supporting individuals and their successful reintegration into society.

Title II WIOA Section 225 funds will be allocated by the NC Community College System according to a formula adopted by the North Carolina State Board of Community Colleges. NCCCS will allocate AEFLA

funds for multiyear awards for three years with a re-application process for continued funding in year two and three for grantees in good standing. The NCCCS will require that all eligible providers use the same application process as referenced in Common Elements, Distribution of funds for Core Programs, section 5 B of the NC Unified State Plan for sections 231, 225, and 243 to ensure direct and equitable access for all eligible providers.

The Title II WIOA Section 225 funding formula has three components:

1. Base: 30% of available funding is allocated equally across providers.

2. Participation: 30% of available funding is allocated based on provider's share of participants. That share is multiplied by a dedicated allotment to determine provider allocation. Participant is defined as an individual in a Title II program who has received at least 12 hours of service in a Period of Participation (POP).

3. Performance: 40% of available funding is allocated based on provider's share of Measurable Skill Gains (MSGs). That share is multiplied by a dedicated allotment to determine provider allocation.

(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.

The North Carolina Community College System Office, College and Career Readiness Unit, will establish and operate Integrated English Literacy and Civics Education (IEL/CE) under Section 243 to provide educational services to adult English Language Learners (ELLs). Educational services will be provided to ELLs who are adults, including professionals with degrees and credentials in their native countries, that enables such adults to achieve competency in the English language and acquire the skills necessary to function as effectively as parent, workers, and citizens in the United States. IEL/CE providers will be established through a competitive Request for Proposal (RFP) process. The competitive RFP process for IEL/CE funding will ensure that distribution of IEL/CE resources are equitable for all eligible adult education Section 243 providers. Funds available under section 211 (a) (2) of WIOA will be for a three-year cycle. However, the North Carolina Community College System Office, College and Career Readiness Unit will monitor providers for program effectiveness and fidelity. During the three-year program period, providers must demonstrate effectiveness in performing Section 243 requirements of IEL/CE in combination with Integrated Education and Training (IET). To meet the requirements of Section 243, providers are required to offer the following services: English Language Acquisition Services, Civics Education, and Integrated Education and Training (IET).

In order to facilitate the IELCE program, providers are required to offer a schedule that demonstrates coordinated instructional services, with sufficient intensity and duration. Also, providers are required to submit sample lesson plans that document contextualized instruction. Instructional practices must be

centered around a single learning objective that directly correlates to a career pathway and credential attainment. All IELCE courses must be contextualized and align with the North Carolina Adult Education Content Standards.

The Integrated English Literacy and Civics Education Program must include the three pillars outlined below:

1. English Language Acquisition

To address the requirement of English Language Acquisition, providers' instructional practices must be delivered with the intent to enhance each adult learner's Reading, Writing, Listening, Speaking, and comprehension of the English language competencies.

2. Civics Education

Per the requirement of the IEL/CE program, providers must deliver instruction centered around civics education. Civics educational services may include information about civic participation, US History, and Naturalization. Civics Education must be combined with the with English language services.

3. Integrated Education and Training (IET)

The term "integrated education and training" means a service approach that provides adult education and literacy activities concurrently and contextually with the workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement.

Integrated Education and Training services are required to be offered in combination with English Language Acquisition and Civics Education instruction. Integrated Education and Training services will include workforce and occupational preparation services, that will lead to an industry recognized credential, certificate, or diploma. Additionally, Integrated Education and Training services must lead to unsubsidized employment. Integrated Education and Training programs must be offered concurrently, this means the training services must be offered within the same week as the English Language Acquisition and Civics Education courses.

IELCE programs must develop and sustain both community and employer-based partnerships to enhance the overall quality of Integrated Education and Training opportunities. Providers are required to work with local partners to assess the business and industry needs in their regional areas. Providers must leverage partnerships by offering experiential learning opportunities for ELLs such as: field trips, guest speakers, internships, , pre-apprenticeships, youth apprenticeships and registered apprenticeships. Strong sustainable partnerships will assist programs with providing employment and training opportunities for adult learners within their local communities. Providers must partner with employers to help increase the skills of incumbent workers that require additional training on an as needed basis. Providers should partner with employers to provide training that will assist incumbent workers with learning new skills that will help them obtain a family sustaining wage, or advance in their careers.

Eligible IELCE providers must offer support services to ensure that adult learners can successfully complete the IELCE program. Providers must work with local agencies such as the Department of Health and Human Services, K-12 Local Education Agencies (LEAs), childcare agencies, public libraries, Department of Motor Vehicles, and housing organizations to address the needs of the adult learners enrolled in the program. By working with local agencies to support adult learners, this will help providers develop instructional and training schedules that are flexible to meet student need.

The North Carolina Community College System Office, College and Career Readiness Unit, will make Section 243 funds available to all eligible agencies. Providers will request funds to facilitate the program via a competitive RFP. All applicants will be evaluated using a rubric and scoring process that is in accordance with activities as outlined in WIOA Section 243. Funds available under section 211 (a) (2) of WIOA will be

for a three-year cycle. Resources will be allocated based upon a funding formula developed by the North Carolina Community College System Office. Providers will be funded based upon their ability to meet the 13 Considerations; 231(e) will be used as evaluative criteria.

Providers that request IEL/CE funds are required to submit a budget that includes detailed expenditures for the program year. Providers will be required to submit a target number of adult learners that will be served by the IEL/CE program. Within the RFP document, providers will be required to submit the number of adult ELLs that were in enrolled during the previous program year. Providers will be required to document the number of students served by the IEL/CE program during the previous program year.

Providers will be evaluated based upon their demonstrated effectiveness to provide the required services of the IEL/CE program. To meet the requirements of the program, providers will be required to offer the following services: English Language Acquisition, Civics Education, and Integrated Education and Training. Furthermore, providers will be evaluated based upon their demonstrated need to provide IEL/CE services in their designated service areas. Providers will be required to submit documentation from the US Census Bureau to establish the need to provide IEL/CE services.

The North Carolina Community College System Office, College and Career Readiness Unit will monitor providers for program effectiveness and fidelity. During the three-year funding period, providers must demonstrate effectiveness in performing Section 243 requirements of Integrated English Literacy and Civics Education in combination with Integrated Education and Training (IET).

Funded providers will be required to work with local employers and industry to assess local occupational needs. Providers will be required to collaborate with local employers by cultivating internships, pre-apprenticeships youth apprenticeships and registered apprenticeships, and work experience opportunities (funded by Title I). Providers facilitating the IEL/CE program should partner with their regional North Carolina Registered Apprenticeship Workforce Development Specialist to offer training for careers that have been deemed in-demand within their regional areas.

In addition to English Language Acquisition and Civics Education, providers will be required to offer soft skills training, workforce preparation, and occupational preparation training content within the classroom that can be transferrable to opportunities for employment. Additionally, providers will be required to offer credentials of attainment that meet the business needs and required skill-set for in-demand careers within their service area.

Providers must create job placement pipelines with local employers within their local service areas. Providers will be required to document their partnerships with local employers by submitting Memorandums of Understanding (MOUs). The job placement MOUs will be evaluated by the North Carolina Community College System Office, College and Career Readiness Unit. Providers are required to work with their local NC Works Center to create opportunities for advancement and job placement for the adult ELLs served by the IEL/CE program.

Section 243 service providers are required to work with their Local Workforce Development Boards (LWDB) and NC Works Centers to implement the requirements of the IEL/CE program. Providers should recruit students from a myriad of settings, however the provider should work closely with the NC Works Center to create a mutually beneficial referral system for IEL/CE participants. Providers should serve on the LWDB and other sub-committees pertaining to the LWDB to meet the needs of the ELLs served the by IEL/CE program. Providers must facilitate evidence-based rigorous instruction centered around regional in-demand careers within the state of North Carolina. Providers will develop a MOU that outlines the activities that will be completed by both the Title II provider and LWDB.

Providers must develop customized instructional and training materials that have been approved by the LWDB. Providers must align resources to meet the regional training and employment needs of their service area. In conjunction with the LWDB, providers will leverage funding to support the educational attainment

and career advancement of ELLs. Providers will work with their LWDB to complete the following task as it pertains to the IEL/CE program:

1. Increase access to employment opportunities that will assist ELLs with earning a family sustaining wage,

2. Coordinate career pathways and workforce training opportunities to support regional needs,

3. Develop equitable employment and career advancement opportunities for ELLs within the service area,

4. Assist unemployed and underemployed adult ELLs with education and training opportunities to increase self-sufficiency and;

5. Develop business and industry employment demand cross-walks for registered apprenticeship program completion to immediate job placement, or entrepreneurship opportunities.

(e) **State Leadership.**

Describe how the State will use the funds to carry out permissible State Leadership Activities under section 223 of WIOA, if applicable.

NCCCS, College and Career Readiness (CCR), Title II will use up to 12.5 percent of funds available under section 222 (a)(2) to improve the quality of adult education and literacy activities. NC Professional Development System's vision is that NC adult educators and their partners engage in professional learning communities to improve lives through learning. Our mission is to engage practitioners and partners in ongoing, accessible and reflective learning opportunities that positively impact practice and connect adult educators in the field.

The NC CCR Professional Development Plan, implemented the LINCS State Leadership Self-Assessment Tool to develop a plan for prioritizing and implementing required activities:

The alignment of adult education and literacy activities with other core programs and one-stop partners, including eligible providers, to implement the strategy identified in the unified State plan under section 102 or the combined State plan under section 103, including the development of career pathways to provide access to employment and training services for individuals in adult education and literacy activities.
The establishment or operation of high quality professional development programs to improve the instruction provided pursuant to local activities required under section 231(b), including instruction incorporating the essential components of reading instruction as such components relate to adults, instruction related to the learners, instruction provided by volunteers or by personnel of a State or outlying area, and dissemination of information about models and promising practices related to such programs.
The provision of technical assistance to eligible providers of adult education and literacy activities receiving funds under this title, including--
the development and dissemination of instructional and programmatic practices based on the most rigorous or scientifically valid research available and appropriate, in reading, writing, speaking, mathematics, English language acquisition programs, distance education, and staff training;
the role of eligible providers as a one-stop partner to provide access to employment, education, and training services; and

- assistance in the use of technology, including for staff training, to eligible providers, especially the use of technology to improve system efficiencies.
- 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.

The College and Career Readiness Unit Title II Professional Development System will use funds made available under section 222(a)(2) to engage adult education providers on their roles and responsibilities as

core WIOA partners to participate on the operation of their local one-stop center, NC Works. CCR, Title II has identified senior staff to lead the training and technical assistance to providers on collaboration with the 23 NC Workforce Development Boards. Three main areas for professional development to meet this required activity include:

- NC CCR office will meet quarterly with NC Workforce Development Board Association and include representatives of Title II program directors to meet quarterly to build working relationships to plan and collaborate on strategies to support access to employment and access to employment and training services for individuals in adult education and literacy activities.

CCR, Title II will collaborate with Local Workforce Development Boards to define a process for reviewing, amending and signing the Memorandum of Understanding.
CCR, Title II will provide training on Career Services with core partners. Regional trainings in collaboration with NC Works will be organized annually to ensure adult education students are aware and have access to Career Service.
CCR, Title II, State Director will serve on the WIOA State Steering Committee

- CCR, Title II, will work with State WIOA Steering Committee designated to monitor exit performance indicators.

The College and Career Readiness Unit Title II Professional Development System will use funds made available under section 222(a)(2) to provide high quality professional development system to improve instruction with an emphasis on career contextualized instruction, to improve the comprehensive instructor credentialing system, NC Core Credentials and to build program's capacity for implementing models to accelerate transition, such as Integrated Education and Training and Pre-Apprenticeships that lead to a registered apprenticeship.

The NC Core Credentialing System, designed to provide fundamental knowledge and methods of instruction for adult education is currently being redesigned to instruct and disseminate up to date research based instructional strategies and to be offered completely at a distance. This update will also model research-based distance learning instructional strategies. It will also include a robust tracking system to allow for better PD evaluation.

NC CCR created regional professional development centers hosted by consistently high performing providers including community college adult education and community based organization providers, to offer professional development and technical assistance. The Center of Excellence for Performance and Center of Excellence English Language Leaners Transition to the Workplace. This approach allows for an authentic assessment of needs as these Centers can identify with the challenges experienced by local providers and can create hands on training that is based on best practices.

The Centers of Excellence model will be evaluated and replicated to include other essential topic areas.

CCR, Title II Professional Development works in collaboration with Appalachian State Adult Basic Skills Professional Development to offer intensive training on essential components of reading.

CCR Professional Development system provides training on providing the necessary wrap around services, specifically academic and career advising. A train-the trainer model is being implemented. CCR, Title II will partner with NCCCS Student Success Centers to disseminate research based advising frameworks.

CCE Professional Development System will collaborate with NC Community College System to provide training on the development and implementation of pre-apprenticeships programs linked to NC Registered Apprenticeships.

CCR, Tittle ll Professional Development System will partner with the NCCCS Virtual Learning Center to offer on demand and regional training on using technology to improve instruction, improve distance learning opportunities and to improve program management.

CCR, Title II established the Regional CCR Representatives system to provide continuous monitoring and grantee oversight of activities and to disseminate best practices models

Describe How the State will Use Funds to Carry Out Permissible State Leadership Activities under Section 223 of WIOA, Title II if applicable.

CCR, Title II will use funds to carry out permissible state leaderships activities to support statewide initiatives to promote the purpose of this title to include:

Developing content and models for integrated education and training and career pathways. CCR, Title II will collaborate with Apprenticeship NC to provide training and support to create pre-apprenticeships linked to Registered Apprenticeships.

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, including identifying curriculum frameworks and aligning rigorous content standards. CCR, Title II Career READY project will work in collaboration with NC Community College System to prepare adults to enter gateway math and English postsecondary courses to facilitate transition to post-secondary. CareerREADY Project creates transition centers that provide advising, academic preparation, and career advising, thus creating a framework that prepares adults for the academic requirements for enrollment in nonremedial for- credit courses in NC community colleges.

The development and implementation of programs and services to support workplace adult education and activities by identifying curriculum frameworks for employability skills training. CCR Title II, will collaborate with NCCCS and Perkins to support workplace preparation activities.

Integration of literacy and English language instruction with occupational skill training, including promoting linkages with employers. CCR, Title II, Center of Excellence for English Language Learners Transition to the Workplace will provide technical support and training on effective models to accelerate transition.

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). In collaboration with NCCCS Research and Performance, providers will have Data Dashboards to provide data analytic tools to monitor program performance and meet state adjusted level of performance.

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.

(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.

The College and Career Readiness (CCR), Title II will assess the quality of all sub-grant recipients both from fiscal and programmatic perspectives continuously.

The CCR, Title II Regional Program Representatives evaluates program quality through the continuous monitoring process. Their duties include:

- coordinates and provide technical assistance to local providers aimed at improving program compliance, quality, performance and accountability,

- coordinates monthly webinars with their assigned provider,
- tracks performance, and quarterly reports,
- recommends trainings as needed,
- serves as main point of contact for their assigned provider,
- assist in the Risk Assessment process.

CCR, Title II has a Risk Assessment Grant Monitoring Process, Onsite, and Desktop in place to assess quality and compliance. Monitoring components include:

Upon completion of the risk assessment and program evaluation, all Providers will be classified as high, moderate or low risk. Each level of risk will have various levels of programmatic and fiscal monitoring that will be implemented during the program year. The purpose of the monitoring reviews will be to confirm that programs are expending and obligating the funds as stated in the initial approved grant application. The different types of programmatic and fiscal monitoring may include:

- On-Site Monitoring
- Desktop Monitoring
- Submission of Additional Documentation
- Required Attendance at Trainings/Technical Assistance

As a requirement of the federal award, the pass-through entity, which in this case would be the NCCCS System Office and auditors are to have access to the subgrantees records and financial statements as necessary for the pass-through entity to meet the requirements. In most circumstances, the Chief Financial Officer (CFO) of the institution will have all the required financial documentation. Documents that should be available for review may include:

- General Ledger Chart of Accounts
- Prior Year General Ledger that includes monthly expenditures
- Maintenance of Effort (MOE) Documentation
- Payroll information to document the staff paid out of the federal award
- Time and Effort Documentation
- Cash Management Procedure
- Allowability Procedure
- Travel Policy
- Procurement Procedure

Upon completion of the monitoring, a Corrective Action Plan (CAP) may be required to resolve the issues located during the evaluation. The Provider will be required to submit a plan detailing how the incorrect programmatic and/or fiscal practices will be amended within the required time frame. If there are unresolved CAP(s), further action may be taken to include:

- Specific award conditions/restrictions

Technical Assistance and training will be provided during the program year, to help mitigate and alleviate some of the factors that constitute as risk. All Providers will receive information about the information sessions that will be facilitated via the System Office Compliance team.

Additional program quality evaluation will be based on:

Program Practices

- number of years that the program administrator has been in the position
- number of years that the data administrator has been in the position
- percentage of instructors who are credentialed
- if there has been a Corrective Action Plan in the last five years and how many findings

- how many years since an onsite review

Performance and Assessment

- what is the agency's retention rate for the preceding year
- what is the agency's post-test rate
- what is the agency's overall MSG rate by POPs
- does the agency have a trained, fulltime data manager
- does the agency have a trained assessment specialist

(g) ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS AND ASSURANCES

States must provide written and signed certifications that:	
1.	The plan is submitted by the State agency that is eligible to submit the plan;
2.	The State agency has authority under State law to perform the functions of the State under the program;
3.	The State legally may carry out each provision of the plan;
4.	All provisions of the plan are consistent with State law;
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;
6.	The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;
7.	The agency that is submitting the plan has adopted or otherwise formally approved the plan; and
8.	The plan is the basis for State operation and administration of the program;
The State Plan must include assurances that:	
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);
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;
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;
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.
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).

Section 427 of the General Education Provisions Act (GEPA)

Instructions: In the text box below, 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.

NOTICE TO ALL APPLICANTS

The purpose of this enclosure is to inform you about the following provision in the Department of Education's General Education Provisions Act (GEPA) that applies to applicants for new grant awards under Department programs. This provision is Section 427 of GEPA, enacted as part of the Improving America's Schools Act of 1994 (Public Law (P.L.) 103-382).

To Whom Does This Provision Apply?

Section 427 of GEPA affects applicants for new grant awards under this program. ALL APPLICANTS FOR NEW AWARDS MUST INCLUDE INFORMATION IN THEIR APPLICATIONS TO ADDRESS THIS NEW PROVISION IN ORDER TO RECEIVE FUNDING UNDER THIS PROGRAM.

(If this program is a State-formula grant program, a State needs to provide this description only for projects or activities that it carries out with funds reserved for State-level uses. In addition, local school districts or other eligible applicants that apply to the State for funding need to provide this description in their applications to the State for funding. The State would be responsible for ensuring that the school district or other local entity has submitted a sufficient section 427 statement as described below.)

What Does This Provision Require?

Section 427 requires each applicant for funds (other than an individual person) to include in its application a description of 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. This provision allows applicants discretion in developing the required description. The statute highlights six types of barriers that can impede equitable access or participation: gender, race, national origin, color, disability, or age. Based on local circumstances, you should determine whether these or other barriers may prevent your students, teachers, etc. from such access or participation in, the Federally-funded project or activity. The description in your application of steps to be taken to overcome these barriers need not be lengthy; you may provide a clear and succinct description of how you plan to address those barriers that are applicable to your circumstances. In addition, the information may be provided in a single narrative, or, if appropriate, may be discussed in connection with related topics in the application.

Section 427 is not intended to duplicate the requirements of civil rights statutes, but rather to ensure that, in designing their projects, applicants for Federal funds address equity concerns that may affect the ability of certain potential beneficiaries to fully participate in the project and to achieve to high standards. Consistent with program requirements and its approved application, an applicant may use the Federal funds awarded to it to eliminate barriers it identifies.

What are Examples of How an Applicant Might Satisfy the Requirement of This Provision?

The following examples may help illustrate how an applicant may comply with Section 427.

(1) An applicant that proposes to carry out an adult literacy project serving, among others, adults with limited English proficiency, might describe in its application how it intends to distribute a brochure about the proposed project to such potential participants in their native language.

(2) An applicant that proposes to develop instructional materials for classroom use might describe how it will make the materials available on audio tape or in braille for students who are blind.

(3) An applicant that proposes to carry out a model science program for secondary students and is concerned that girls may be less likely than boys to enroll in the course, might indicate how it intends to conduct "outreach" efforts to girls, to encourage their enrollment.

(4) An applicant that proposes a project to increase school safety might describe the special efforts it will take to address concern of lesbian, gay, bisexual, and transgender students, and efforts to reach out to and involve the families of LGBT students

We recognize that many applicants may already be implementing effective steps to ensure equity of access and participation in their grant programs, and we appreciate your cooperation in responding to the requirements of this provision.

Estimated Burden Statement for GEPA Requirements

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. Public reporting burden for this collection of information is estimated to average 1.5 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain benefit (Public Law 103-382. 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 Education, 400 Maryland Ave., SW, Washington, DC 20210-4537 or email **ICDocketMgr@ed.gov** and reference the OMB Control Number 1894-0005.

- SF424B - Assurances – Non-Construction Programs (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)
- Grants.gov - Certification Regarding Lobbying (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)
- SF LLL Form – Disclosure of Lobbying Activities (required, only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)

IX. PROGRAM SPECIFIC REQUIREMENTS: VOCATIONAL REHABILITATION – BLIND PROGRAM

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan 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:

(a) Input of State Rehabilitation Council

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

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 NC Division of Services for the Blind (DSB) partners with the DSB State Rehabilitation Council (SRC) to develop and improve services for North Carolinians who are blind, visually impaired or deafblind. SRC members provided input regarding DSB's vocational rehabilitation program's development and revision of rules, policies and procedures; recommended goals and priorities; review and analysis of the consumer satisfaction report; comprehensive statewide needs assessment planning and the 2018 modification to the VR portion of the Unified State Plan. Input was provided through calls and meetings with the Division's director and SRC chair and during quarterly meetings with the full council.

The SRC provided input and approval for VR policies and procedures created or revised during PY 2018 pertaining to the DSB Career and Training Center, Definitions, and Assistive Technology Vendor Services. The SRC supported a name change for the center to the DSB Career and Training Center to better reflect the vocational services provided as the former title, NC Rehabilitation Center for the Blind, was often perceived by prospective students as a facility to treat medical or substance abuse issues that impacted their interest and willingness to enroll. Additionally, the policy and procedures regarding referrals, admission, and services were clarified and updated as needed. Consumer input provided during listening forums and previous needs assessments identified the increasing need for consumer training in the use of assistive technology to help them achieve their employment and independent living goals. As a result, a policy was created with input and support from the SRC, to enhance the division's capacity to provide this service. Potential vendors will be screened according to standard criteria per type of assistive technology to determine their skill levels and upon approval by the division's AT staff, these vendors may be hired to teach consumers.

The SRC made the following recommendations:

Recommendation 1: Continue the practice of holding SRC meetings in locations across the state to help facilitate listening forums with consumers and other stakeholders to obtain feedback regarding unmet needs and the effectiveness of and satisfaction with VR services.

Recommendation 2: Develop marketing materials with a unique, branded symbol specific to the Division of Services for the Blind for outreach to current and potential recipients of services, employers, referral sources and community partners.

Recommendation 3: Change the name of DSB's center to better reflect the nature of the services provided and remove the medical model stigma of being referred to as the Rehabilitation Center for the Blind.

Recommendation 4: Enhance assistive technology services and support for consumers.

The administration and management of the consumer satisfaction survey is a coordinated effort between by the SRC and the DSB. The SRC provided input and approved a change in the division's procedures for

completing consumer satisfaction surveys. For Federal Fiscal Year 2018 telephone surveys were conducted under a contract with the North Carolina State University, Center for Urban Affairs and Community Services. Survey samples were generated using a weighted random sampling design that included clients with open cases and those whose cases that had recently closed. Interviewers made up to six attempts to reach each person included in the sample. Highlights from the FFY 2018 survey results are below:

- Are you satisfied with your VR counselor and other VR program staff in terms of:
    - Treating you with courtesy and respect ……96%
    - The time it took to determine your eligibility for VR …… 96%
    - Timeliness of VR services provided under your plan for employment, including job development and placement …….. 90%
    - Helping you keep your job and following-up with your after you went to work …….. 100%
- Overall, are you satisfied with your experience with the VR program……. 92%
- The areas with the most opportunity for improvement:
    - Helping you decide on job choices …….. 80%
    - Helping you find a job …….. 63%

The SRC is supportive of DSB efforts to improve in these areas.

A change in DSB's methodology to complete the comprehensive statewide needs assessment jointly with the NC Division of Vocational Rehabilitation Services was approved by the SRC. Additionally, during its' March 9, 2018 quarterly meeting, the SRC agreed with the priorities and goals submitted in the 2018 modification of DSB's VR program's portion of the Unified State Plan.

the Designated State unit's response to the Council's input and recommendations

Recommendation 1: Continue the practice of holding SRC meetings in locations across the state to help facilitate listening forums with consumers and other stakeholders to obtain feedback regarding unmet needs and the effectiveness of and satisfaction with VR services. Agency response: DSB agrees with and supports this recommendation. Recent SRC quarterly meetings were held in Charlotte, NC March 2019 and in Wilmington, NC June 2019 during which the SRC hosted and facilitated stakeholder engagement and listening forums.

Recommendation 2: Develop informative, educational materials with a unique, branded symbol specific to the Division of Services for the Blind for outreach to current and potential recipients of services, employers, referral sources and community partners. Agency response: DSB agrees with and supports this recommendation. The branded symbol and a brochure have been created.

Recommendation 3: Change the name of DSB's center to better reflect the nature of the services provided and remove the medical model stigma of being referred to as the Rehabilitation Center for the Blind. Agency response: DSB agrees with and supports this recommendation. This change was completed in April 2019.

Recommendation 4: Enhance assistive technology services and support for consumers. Agency response: DSB agrees with this recommendation and has drafted the policy and procedures.

the designated State unit's explanations for rejecting any of the Council's input or recommendations.

DSB did not reject any of the Council's input or 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:

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;

Since no waiver request is made, this requirement will not apply to the North Carolina VR Programs for the program years covered under the State Unified Plan.

the designated State unit will approve each proposed service before it is put into effect; and

Since no waiver request is made, this requirement will not apply to the North Carolina VR Programs for the program years covered under the State Unified Plan.

requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

Since no waiver request is made, this requirement will not apply to the North Carolina VR Programs for the program years covered under the State Unified Plan.

(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;

DSB has established cooperative and collaborative working relationships with various federal, state and local agencies and organizations in our mission to help blind, visually impaired and deafblind citizens of North Carolina receive the most comprehensive and beneficial services and supports available to facilitate their vocational and independent living goals. DSB has a cooperative agreement with the Department of Public Instruction (DPI). The agreement with DPI establishes coordination for the provision of educational and transitional services to students with visual impairments. DSB has a cooperative agreement with the University of North Carolina System (UNC). DSB partners with UNC's Department of Allied Sciences in support of the university's rehabilitation counseling program. This includes the programs on campuses of UNC-Chapel Hill, Winston-Salem State University, A&T State University, East Carolina University, and North Carolina Central University campuses. The Division provides clinical experiences for students in the program through DSB district offices and the residential rehabilitation facility. DSB and UNC mutually plan and schedule student assignments. The Division provides students training and supervision, mentoring, constructive feedback and formal evaluations. Students are also provided office and work space, use of computers and other office equipment and technology, and exposure to other professions in the field rehabilitation such as, orientation and mobility, low vision, social work and medical eye care. UNC provides DSB staff opportunities to participate in clinical education conferences and meetings. This collaborative relationship also creates potential employment opportunities for students upon the completion of their education.

Additionally, DSB has cooperative agreements that establish policies and procedures for information sharing, referrals and service coordination with other divisions within the NC Department of Health and Human Services including but not limited to the Division of Vocational Rehabilitation Services, Division of Services for Deaf and Hard of Hearing, and the Division of Social Services. DSB has established an informational sharing agreement with the Division of Medical Assistance to facilitate the use of the Medicaid Management Information System for North Carolina to ensure all approved medical cost services provided by the division are at the appropriate pricing tiers. A cooperative agreement has also been established with the Social Security Administration to facilitate the receipt of Social Security benefits information for VR program applicants and participants.

Cooperative agreements have been established with the Eastern Band of Cherokee and Lumbee Tribal VR Programs in NC. The agreements specify how DSB and the Tribal VR Programs will jointly serve eligible individuals who have a disability of vision impairment or deafblindness to provide efficient and effective vocational rehabilitation services; to ensure that Tribal members with disabilities eligible for vocational rehabilitation services are offered informed choice of program, services and service providers; to provide guidelines for information sharing when concurrent services are being provided; to facilitate cultural awareness and improve professional skills among staff; and to establish the working relationship between the Tribal VR Programs and DSB so that the individual programs and their consumers benefit from shared expertise, training, professional collaboration and the enhanced capabilities that will grow from this relationship. Additionally, the program directors for the Tribal Vocational Rehabilitation programs rotate membership on the SRC.

DSB has informal collaborative relationships with other organizations and consumer and advocacy groups that are not carrying out activities under the Statewide Workforce Investment System such as the Governor Morehead School, NC Association of Blind Students, Governor Morehead School Alumni Association, NC Library for the Blind and Physically Handicapped, North Carolina Lions Inc., NC Association for Education and Rehabilitation of the Blind and Visually Impaired and Prevent Blindness NC, Consumer Advocacy and Advisory Committee, North Carolina Conference on Visual Impairment and Blindness (NCCVIB) and Envisioning Youth Empowerment (EYE). DSB and the organizations and groups collaborate in referrals for services and supports, sharing information and resources, sponsorship and participation in trainings and events, outreach and educating the general public about blindness and vision loss and increasing the general public's awareness of the needs and abilities of individuals who have visual disabilities.

DSB is one of the designated state units (DSUs) that serve as a part of the NC Statewide Independent Living Council (NC SILC). NC SILC in collaboration with the DSUs develops three-year State Plans for Independent Living (SPILs). DSB actively engages with the SILC in the development of goals, objectives and measures to help meet the independent living needs of North Carolinians who have disabilities. These entities serve together on various work groups and committees such as governance, community-based living, youth leadership forum, evaluation, civil rights and IL services and supports. The work groups and committees address matters and complete the tasks and activities required to achieve the goals and desired outcomes stated in the SPIL. A SILC member serves on the DSB State Rehabilitation Council.

Cooperative and collaborative relationships have been established between NC Centers for Independent Living (CILs) and DSB. Consumers are referred by and to each entity, relevant information is shared, CILs allows DSB the use of facilities for DSB to provide consumers community-based independent living skills training and in return DSB staff provides CIL staff in-service training pertaining to visual disabilities. DSB provides consumers individual advocacy skills training and refers to the CILs for systems change advocacy needs.

(2) <u>State programs carried out under section 4 of the Assistive Technology Act of 1998</u>

The North Carolina Assistive Technology Program (NCATP) is a state and federally funded program that provides assistive technology services statewide to people of all ages and abilities. NCATP leads North

Carolina's efforts to carry out the federal Assistive Technology Act of 2004 by providing device demonstration, short-term device loans, and reutilization of assistive technology. NCATP has nineteen staff serving the state of North Carolina, which includes the Director, AT Information/ Referral /Funding Specialist, Intake Coordinator, Inventory Specialist, 1 AT Re-use Special Projects Assistant, 4 Speech Language Pathologists (SLP) and 8 Assistive Technology Consultants. The 8 AT Consultants and 4 SLPs provide direct one-on-one services in the Assistive Technology Centers.

DSB collaborates with the NC Assistive Technology Program in joint planning, training and service provision to make best use of all rehabilitation technology resources available internal and external to the NC Department of Health and Human Services. NCATP services are arranged for and provided to DSB consumers as needed. DSB also partners with NCATP as a sponsor of the Assistive Technology Expo that is held by NCATP annually.

(3) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture

The DSB VR Program does not currently have a cooperative agreement with the Department of Agriculture.

(4) Non-educational agencies serving out-of-school youth

DSB will continue our efforts to expand our partnerships with noneducational agencies such as the CILs to serve out-of-school youth in addition to the other populations the organizations mutually serve. Consumers are referred by and to each entity and relevant information is shared. CILs allow DSB the use of facilities for DSB to provide consumers community-based independent living skills training and in return DSB staff provides CIL staff in-service training pertaining to visual disabilities. DSB provides consumers individual advocacy skills training and refers to the CILs for systems change advocacy needs.

DSB staff presently work with the CILs to coordinate services for specific individuals and also to address areas of broader systemic impact such as community education, disability awareness, and outreach services to various disability groups, including out-of-school youth.

(5) State use contracting programs

At this time, DSB does not directly engage in a formally established state use contracting program, where commodities or services determined to be of use to state agencies are purchased from community-based rehabilitation programs employing and training individuals with significant disabilities. DSB does however sponsor specific client services through several community rehabilitation programs that provide training services to DSB consumers through contracts.

(d) **Coordination with Education Officials**

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.

DSB's policy defines transition services as a coordinated set of activities for a student, designed within an outcome-oriented process that promotes movement from school to post school activities including post-secondary education, vocational training, integrated employment including supported employment, continuing and adult education, adult services, independent living, or community participation. The policy establishes that the coordinated set of activities shall be based upon the individual student's needs, considering the student's preferences and interests, and shall include instruction, community experiences, the development of employment and other post school adult living objectives, and when appropriate,

acquisition of daily living skills and functional vocational evaluation. Transition services are provided by the DSB program to students beginning at age 14.

WIOA stipulates that required pre-employment transition services/activities (Pre-ETS) be provided to students with disabilities ages 14-21 years of age that may be clients or potential clients of the agency. These students may be involved in secondary or postsecondary education or post-secondary training programs and they may or may not have completed a DSB Application for VR Services. DSB policy states that pre-employment transition services provided to students must be followed up by appropriate documentation of the services rendered.

DSB offers a wide variety of services to students with visual impairments or blindness in transition to the world of work. Each student served by the DSB VR program must have an Individualized Plan for Employment (IPE) that is jointly developed with students/parents and a vocational rehabilitation counselor. The IPE must be developed and approved within 90 days after the student has been found eligible for vocational rehabilitation services. The Individuals with Disabilities Education Act (IDEA) requires transition planning. The Individualized Transition Plan (ITP) services are included in a student's Individualized Education Plan (IEP). DSB transition staff and VR counselors are expected to participate in student IEP meetings pertaining to transition matters. The IPE incorporates transitional elements of the student's Individualized Education Plan (IEP), along with the student's plans for transitioning from secondary school to employment. Local school systems provide students services that are within its legal responsibility and customary practice. These services are provided without cost to DSB. DSB provides transitional and supportive services that are not available through the local school systems. All costs for services for which a student is found eligible is paid for through DSB VR case service funds.

Information on the formal interagency agreement with the State educational agency with respect to:

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;

A formal cooperative agreement exists with the NC Department of Public Instruction, which consists of 115 local education agencies (LEAs), 128 charter schools, 1 regional school and 2 education entities. The purpose of the agreement is to facilitate and coordinate the delivery of pre-employment transition services and other transition services as defined by WIOA and IDEA for students who are visually impaired, blind, or deafblind being served by LEAs and the schools who are of transition age (14 to 21) and who need VR services to become employed. The agreement identifies the duties and responsibilities of DSB and the LEAs and encourages local LEAs and schools to develop working relationships with vocational rehabilitation staff who cover their corresponding areas. Our mutual responsibilities include collaboration in the provision of pre-employment transition services, dispute resolution and the provision of:

- consultation and technical assistance (services, accommodations and assistive technology, requirements in Section 511 of the Rehabilitation Act, etc.);
- joint educational/training opportunities;
- policy and practice alignment where possible;
- transition planning; and
- referral and outreach activities.

Additionally, DSB has separate agreements with nine LEAs and one regional school across the state. These agreements designate cost sharing of transition staff positions (vocational rehabilitation counselor and community employment specialist), the duties of these positions and the services to be provided by both parties in meeting the needs of transition age students. The school systems with whom DSB continues to have agreements are Brunswick County, Charlotte-Mecklenburg County, Cumberland County, Guilford

County, New Hanover County, Onslow County, Pender County, Wake County Schools, Winston-Salem-Forsyth County Schools, and the Governor Morehead School for the Blind. While DSB's goal is that all eligible students will be served by specialized transition counselors through formal cooperative agreements with the schools, DPI and local LEA budgetary constraints have prevented expansion of cost sharing for transition positions and unfortunately, funding limitation in recent years caused school systems to terminate agreements.

Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

Refer to Description (d)(1)— Coordination with Education Officials

Roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

The Exceptional Children Division of the Department Public Instruction (DPI) and the Division of Services for the Blind (DSB) of the Department of Health and Human Services (DHHS) have the primary responsibilities to ensure that the provisions set forth in the cooperative agreement are carried out. The intent of the agreement is to outline steps that will result in improved services to students with visual impairments resulting in improved educational opportunities, increased employment opportunities, and greater independence.

Formal cooperative agreements currently exist between some LEAs and the DSB to provide rehabilitation services, and particularly transition services, through specialized vocational rehabilitation counselors and business service representatives/community employment specialists. In other areas, the needs of students are addressed by the rehabilitation counselors who primarily serve adults in that geographic area. Cooperation between these two entities is essential to ensure compliance with state and federal laws and regulations, to minimize duplication of effort, and to maximize efficient use of the entities' resources to help individuals with visual impairments complete their education and become employed.

Cooperative agreements developed between the DSB and LEAs should enable students with visual impairments to access rehabilitation services that had not previously been available or readily available to them from the LEA. Transition services provided under rehabilitation plans must not be services normally provided by the LEAs and determined necessary for the provision of a free and appropriate public education if they were not applicants or consumers of the state agency.

The terms of the DPI/DSB cooperative agreement are as follows.

1. Consultation and technical assistance
   DHHS will provide consultation and technical assistance services through its state and local staff. DHHS staff members will assist DPI and LEAs serving students with disabilities in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services and other vocational rehabilitation services. As such:
   a. Consultation and technical assistance may be provided through in -person meetings or through other means, such as conference calls, webinars, or video conferences.
   b. DHHS will provide educational and training opportunities to DPI staff to ensure understanding of pre-employment transition services and other transition services and the roles and responsibilities of DHHS, DPI and the LEAs in the provision of those services.
   c. DHHS and DPI will provide joint educational and training opportunities to LEAs, including teachers and administrators, to ensure they are informed of their roles

and responsibilities under both IDEA and WIOA. Educational and training opportunities will include providing technical assistance on an as-needed basis.

d. DHHS and DPI shall meet annually to address systems, policy, practice and funding issues that facilitate or negatively impact the transition of students with disabilities from school to work or post-secondary education.
e. DHHS and DPI shall, to the extent feasible, align policy and practices at the state and local level to facilitate the seamless transition of students with disabilities from school to work or post-secondary education.
f. DHHS and DPI shall designate individuals to represent the agencies and act as liaisons to facilitate the joint efforts of the two agencies.
g. DHHS and DPI designated liaisons, when requested by local staff, shall provide consultation on determining responsibility in instances where services required by a student may be both a special education or related service under IDEA or a VR service under WIOA.
h. DPI shall provide technical assistance to local education agencies to assure access for students with disabilities in appropriate Career and Technical Education Programs based on recommendations of the Individualized Education Program (IEP) Team.

2. Transition Planning

The parties shall engage in systems-level transition planning for students with disabilities to facilitate the development and implementation of the individualized education programs under 614(d) of the IDEA. The parties acknowledge that while student- level transition planning is the responsibility of staff under the employ and authority of DVRS and DSB, transition planning at the student-level may only be promoted by DPI through policy-making, consultation, professional development, and technical assistance to LEAs. Furthermore, the parties acknowledge that the framework for student-level transition planning shall be outlined in local third-party agreements. As such:

a. DHHS and DPI agree to cooperate and work jointly in providing/promoting transition planning for students with disabilities.
b. DHHS and DPI shall assist LEAs in planning for/promoting the transition of students with disabilities from school to post-school activities, including pre-employment transition services.
c. DHHS and DPI agree to work collaboratively to promote/assist students with disabilities in the development and completion of the Individualized Education Program (IEP) required under the IDEA and the Individualized Plan for Employment (IPE) required under WIOA.
d. DHHS will coordinate with the LEAs on the development of students' IEPs and IPEs through third-party agreements. DPI shall promote and support the development of such agreements.
e. DHHS and DPI shall communicate/encourage communication regarding students' IEP and IPE goals and needed transition services as soon as possible after the IEP and IPE are developed.
f. DHHS and DPI shall foster innovation in transition program design and service delivery strategies between the local DVRS and DSB offices and the LEAs.
g. DHHS and DPI shall support local involvement in the planning and activities of area workforce boards as well as partnerships with local employers to promote programs and services for students and youth with disabilities.
h. DHHS and DPI shall provide consultation to assure access to and programming for students with disabilities in career and technical education, work-based

learning, career assessment, career decision-making training, and career counseling as determined by the local transition planning teams.

3. Pre-Employment Transition Services:
    a. Section 113(a)(b) of the Rehabilitation Act, as well as final §361.48(a)(2), requires DHHS, in collaboration with the LEAs, to provide or arrange for the provision of pre-employment transition services required activities. DHHS shall make these services available to all students with disabilities who need them.
    b. DPI will support and facilitate collaboration between DHHS and the LEAs in providing any or all the following five pre-employment transition services required activities to students with disabilities:
        1. Instruction in self-advocacy and peer mentoring
        2. Work based learning experiences
        3. Counseling on opportunities for enrollment in comprehensive transition or post-secondary educational programs at institutions of higher education
        4. Workplace readiness training
        5. Job exploration counseling

1. Roles and Responsibilities
    a. DHHS shall administer all aspects of the state vocational rehabilitation program including the determination of eligibility, diagnostic and evaluation services, rehabilitation planning, transition services and the provision of a program of vocational rehabilitation services. Some services are subject to the student's financial eligibility and/or comparable benefits.
    b. DPI shall assist LEAs in the planning, development, and implementation of transition services to students with disabilities to become college, career, and community ready.

DHHS shall assume responsibility, within the limit at ion of resources, for the cost of services included in the student's Individualized Plan for Employment (IPE), according to the established DHHS policies and fee schedule.

DHHS shall report annually the total amount of stat e-appropriated monies expended for rehabilitation services for students with disabilities. The report should be made available annually to DPI within 60 days of the end of the state fiscal year.

DPI shall provide access to annual report data on students served through CTED and ECO.

DPI shall support the sharing of diagnostic information of students with disabilities for the purpose of accessing vocational rehabilitation services, including pre-employment transition services, so long as sharing is in compliance with the requirements of the Family Education Rights and Privacy Act and other legal requirements relating to student privacy rights.

DPI shall support practices for LEAs to secure psychological, vocational, and educational assessments, according to state and local policies, for students suspected of needing assessments.

Coordination responsibilities of each agency that promote the coordination, timely and appropriate delivery of transition services (IDEA).

The parties will use the various community media to promote public information and understanding of each program and its various functions.

The parties will promote a system to ensure that appropriate referrals are made with consent of parent/guardian or majority age student to each party.

The parties will emphasize the maximum utilization of comparable benefits defined, as services that are provided or paid for, in whole or in part, by other federal, state, or local public resources, which are available to the student.

Criteria related to subminimum wage requirements in Section 511 of the Rehabilitation Act.

DPI shall provide consultation to DHHS on the development and implementation of documentation processes used by DHHS and the LEA to carry out requirements under Section 511.

DPI and DHHS shall provide consultation and training to LEAs and local DVRS and DSB s ta ff on means for documenting completion of the actions described in 34 CFR 397.20 and 34 CFR 397.30 and processes for transmitting documentation consistent with confidentiality requirements under the Family Education Rights and Privacy Act and IDEA.

DPI shall support, promote, and emphasize the restriction, found in 34 CFR 397.31, that prohibits state and local educational agencies from contracting with entities for the purpose of operating a program for a youth under which work is compensated at a subminimum wage.

DHHS and DPI shall collaborate to inform LEA and local DVRS and DSB staff of the requirement to provide youth with disabilities, aged 14-24, who are known to be seeking sub-minimum wage employment pre-employment transition services and/or IDEA transition services and referral to the VR program.

Procedures for resolving interagency disputes including procedures for LEAs to initiate the process to receive reimbursement or regarding implementation of the agreement. (IDEA)

The parties will utilize best efforts to resolve any dispute that may arise in the provision of services outlined in this agreement and will collaborate to achieve the best possible outcome for students with disabilities.

When there are real or perceived overlaps in the responsibilities for special education or other related services under IDEA and VR services under the Rehab Act, DHHS and DPI shall support and advise local staff in considering the following factors to determine the responsible party:

whether the service is customary to the party from whom the service is requested (if customary, the party should provide);

the primary objective of the service/support (educational or vocational);

the impacts of delaying service provision;

agency-specific policies or limitations around the provision of the service (e.g., maximum purchase rates, selection of providers);

eligibility of student under part B of IDEA;

length of time to exit from school in terms of ongoing need for and replacement frequency of service or equipment (e.g., if equipment is needed, will the lifespan of the equipment be contained to the student's time within the secondary educational setting or extend to the transition from school to post-school activities?); and/or

the need for transferability of skills and practice with service/equipment to be prepared for post-school IPE participation (e.g., will the student need time to practice using equipment or receiving a specific transition service to facilitate transition to post-school services/outcome as planned on the IPE without delay or interruption? If so, this may warrant VR funding of the equipment or service.)

Data Sharing

The parties to this agreement do not anticipate the exchange of data containing personal identifying information. Information exchange shall be limited to non-confidential information or information that has

been de-identified. In the event confidential information will be shared between the parties; the parties will enter into a separate data sharing agreement to cover the exchange of information.

DHHS shall provide data to the Exceptional Children Division about the number of school age students served by the state VR agency, by disability, age, types of services provided and post-school employment outcome.

In its discretion, DPI shall provide appropriate data to Vocational Rehabilitation about students needing services.

DPI shall provide the framework for the collection of exit data by school systems regarding students with disabilities transitioning from school to postschool activities.

DPI shall assist local school administrative units in the planning, development, collection of data, and implementation of transition services for students with disabilities.

The terms of the DSB cooperative agreement with the separate nine LEAs and one regional school system are as follows.

The Division agrees to:

1.1 Finance the program in the same manner as other functions of the Division using state and federal matching funds, as required under Title I of the Federal Vocational Rehabilitation Act. Financing the rehabilitation program shall be on annual budget basis to insure continuity of operations. To receive federal matching funds, the Division must provide state funds equal to the State's share of planned expenditures as specified in the Federal Act.

1.2 Agrees to provide a program of vocational rehabilitation services to eligible individuals referred by the contractor and to other individuals found eligible for services.

1.3 Provide to all potentially eligible visually impaired students, between the ages of 14 to 21 years of age pre-employment transition services with the collaboration of the Contractor. pre-employment transition services are, job exploration counseling, work-based teaming experiences, counseling on opportunities for enrollment incomprehensive transition or postsecondary educational programs at institutions of higher education, workplace readiness training, and instruction in self-advocacy.

1.4 Provide to the Division staff assigned to the program effective and appropriate supervision of the vocational rehabilitation activities.

1.5 Provide administration and consultative support to the contractor in the area of its program responsibilities.

1.6 Share statistical and fiscal reports with the contractor regarding the vocational rehabilitation program, as deemed necessary to open communication and good administration practices, and that are mutually agreed upon by both parties being necessary.

1.7 Provide federal funding in the amount of 78.7 percent of the agreed-upon annual budget depending on the availability of federal funds and the program arrangements.

1.8 Provide, within the limitation of resources, case service funds necessary to the delivery of vocational rehabilitation services.

1.9 Determine, through its professional counseling staff, all decisions affecting an individual's eligibility for services and the nature and scope of rehabilitation services to be provided must be made by the Division and cannot be delegated.

1.10 Provide information deemed appropriate by the contractor regarding eligibility requirements and descriptions of rules, regulations, and policies governing the program.

1.11 Assign one rehabilitation counselor and a community employment specialist to the school system and will maintain an active caseload at all assigned schools. Rehabilitation staff will visit the assigned schools on a scheduled routine basis to receive referrals and to transact other matter necessary to effectively administer the rehabilitation program.

1.12 Contact referred students at the earliest possible time to initiate the process of providing rehabilitation services; however, prior to completing the application for vocational rehabilitation services, parent or guardian permission is required for services to minor. Appropriate feedback will be furnished to the referral source.

1.13 Use existing assessment data when appropriate. When necessary, supplementary assessments will be procured.

1.14 Complete a comprehensive evaluation on each eligible individual, to the degree necessary, to determine the vocational goal and scope of vocational rehabilitation services to be included in the IPE.

1.15 Share consumer specific information with appropriate school personnel upon a duly executed Consent for Release of Confidential Information as specified in 34 CFR 361.38.

1.16 Lunsford Act. Provider also acknowledges that G.S. § 14-208.18 prohibits anyone required to register as a sex offender under Article 27A of Chapter 14 of the General Statutes from knowingly being on the premises of any school. Provider shall conduct or arrange to have conducted, at its own expense, sexual offender registry checks on each of its owners, employees, agents, service providers and independent contractors ("Service providers") who will engage in any service on or delivery of goods to school system property or at a school system sponsored event, except checks shall not be required for individuals who are solely delivering or picking up equipment, materials, or supplies at: (1) the administrative office or loading dock of a school; (2) non-school sites; (3) schools closed for renovation; or (4)school construction sites. The checks shall include at a minimum check of the State Sex Offender and Public Protection Registration Program, the State Sexually Violent Predator Registration Program, and the National Sex Offender Registry ("the Registries"). For provider's convenience only, all of the required registry checks may be completed at no cost by accessing the United States Department of Justice Sex Offender public website at http://w\vw.nsovw.sov/. Provider shall provide certification on the Sexual Offender Registry Check Certification Form (Attachment A) that the registry checks were conducted on each of its service personnel providing services or delivering goods under this agreement prior to the commencement of such services or the delivery of such goods. Provider shall conduct a current initial check of the registries. The sex offender registry checks shall be conducted within 30 days of provider's execution of the agreement and prior to performing any services on school system property. In addition, provider agrees to conduct the registry checks and provide a supplemental certification form before any additional service providers are used to deliver goods or provide services pursuant to this agreement. Provider further agrees to conduct annual registry checks of all service providers and provide annual certifications at each anniversary date of this agreement. Provider shall not assign any individual to deliver goods or provide services pursuant to this agreement if said individual appears on any of the listed registries. Provider agrees that it will maintain all records and documents necessary to demonstrate that it has conducted a thorough check of the registries as to each service provider and agrees to provide such records and documents to the school system upon request. Provider specifically acknowledges that the school system retains the right to audit these records to ensure compliance with this section at any time in the school system's sole discretion. Failure to comply with the terms of this provision shall be deemed a material breach of the agreement.

1.17 Criminal Background Checks. Provider shall conduct criminal record and background checks on all service providers who will perform services pursuant to this agreement on school system property or at school system events. The criminal background checks shall be conducted within 30 days of provider's execution of the agreement and prior to performing any services on school system property. Provider shall provide the results of said checks to school system within five (5) business days of receipt and shall not

assign any service providers to provide services under the agreement if said worker has been convicted of or pled no contest to (1) any felony; (2) any crime, whether misdemeanor or felony, involving violence, illegal drugs, theft, child abuse, sexual harassment, sexual abuse, or personal impropriety of a sexual nature with regard to any other person; or (3) any other crime or conduct reasonably indicating that the service providers poses a threat to the safety or well-being of a school system's students, personnel, or property. In addition, provider shall obtain all authorizations necessary for school system to conduct additional criminal record and background checks at its sole expense at any time during the term of this agreement. If school system chooses to exercise this right, provider shall, within five (5) business days of a school system's request, provide the full name, date of birth, and state of residency for the past 10 years for all service providers providing services under the agreement, along with any other information reasonably requested by school system for purposes of performing criminal record and background checks. Without modifying or waiving any of a provider's obligations under this provision, the school system reserves the right to prohibit any service providers from providing services under this agreement if the school system determines, in its sole discretion, that said service providers have not undergone a criminal record and background check in accordance with this provision or if the results of such criminal record and background check reasonably indicate that the said service providers may pose a threat to the safety or well-being of students, school personnel, or others.

The contractor agrees to:

2.1 Contribute annually a specified sum as the state's share of matching funds which reflect the amount of participation toward providing a program of service. Any contribution of funds shall be made available for expenditure at the sole discretion of the Division. Itis understood that such funds must be spent for rehabilitation services and for the administration of those services; that expenditures must be made under the approved agency state plan; and that expenditures must be made under the control and supervision of the Division of Vocational Rehabilitation Services. The Division will maintain such accounts and supporting documents that will permit an accurate determination at any time of the status of state and federal participation of expenditures incurred in operation of the rehabilitation program. The specific items of each annual budget will be determined jointly and agreed to by the parties prior to the beginning of each fiscal year. The contribution of an invoice by the Division to the contractor will contribute to the Division an annual cash amount of X percent of the school systems total share of the agreed upon annual budget. The local percent match funds are to consist totally of non-federal funds which have not or will not be used to match federal funds other than Federal Vocational Rehabilitation funds used in this program.

2.2 The contractor shall provide adequate office space that is accessible to staff and individuals with disabilities, private for individual counseling, and environmentally comfortable, with conditions that are conducive to confidentiality and counseling. Any and all equipment purchased under this memorandum of agreement will remain the property of the Division.

2.3 Provide maintenance of assigned accommodations, appropriate utilities, and basic telephone services.

2.4 Provide all individuals determined eligible for vocational rehabilitation services with these services that are its legal and traditional responsibility without cost to the Division.

2.5 Assist in securing and sharing diagnostic information of mutual clientele for the purpose of vocational rehabilitation services and will provide, as appropriate, psychological, vocational, and educational assessments for students suspected of needing assessments so long as sharing is in compliance with the requirements of the Family Education Rights and Privacy Act and other legal requirements relating to student privacy rights.

2.6 Develop, in cooperation with the Division, a system to ensure that appropriate referrals are obtained by the Division.

Procedures for outreach to and identification of students with disabilities who need transition services.

The DPI/DSB cooperative agreement includes procedures for *Outreach and Identification of Students with Disabilities* as follows:

DPI shall in form LEAs of services available from DHHS and promote referrals for students with disabilities who may or may not be receiving special education and are in need of pre- employment transition services and/or YR transition services, including the development of an IPE.

The determination of eligibility for vocational rehabilitation services is the sole responsibility of DHHS and cannot be delegated. DHHS shall review the required documentation of students with disabilities who have been referred by the LEA to determine eligibility for vocational rehabilitation services. The student must require vocational rehabilitation services to prepare for, secure, retain, regain, or advance in employment.

Vocational rehabilitation counselors develop and cultivate working relationships with school systems by educating them about the transition and vocational services available through DSB and providing technical assistance and consultation pertaining to the needs of and resources available to transition students. DSB VR counselors participate in school systems' transition fairs as invited in order to meet potentially eligible students and to educate schools, students and parents on DSB services.

DSB has hired and trained pre-employment transition services associates who are equipped to target potentially eligible students ages 14-21 years of age that may require pre-employment transition services. They are instructed to contact parents and teachers to assess need and desire for services, provide pre-employment transition services directly and document all activities regarding service provision. If desired, this position can also refer students to a VR counselor so that they can then apply for a full program of VR services leading to competitive integrated employment. There are seven pre-employment transition services (Pre-ETS) associates positions statewide.

DSB reaches out to various county school systems to assure that they are aware of DSB services. Due to the growth of charter schools, private schools, and home-school organizations, DSB is reaching out to these entities to provide resources for any student who is blind, visually impaired, or deafblind. While most students do attend public schools due to the resources of specialized teachers for persons with visual impairments, DSB recognizes the importance to reach students enrolled in these programs.

Refer to Description (d)(2)(c)— Coordination with Education Officials Coordination, specifically the paragraph titled "Outreach and Identification of Students with Disabilities" for additional information.

(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.

DSB purchases supported employment services, extended services, and community-based work adjustment services from community rehabilitation programs (CRP) for individuals who will require the assistance of a job coach to find a job, to learn the duties of the job, to develop acceptable work habits, and to provide long term support to ensure the individual is able to retain the job if required by the individual. The CRP must meet certain requirements before services are purchased. The contractor will maintain accreditation through the Commission on Accreditation of Rehabilitation Facilities (CARF), Council on Accreditation (COA), or other accreditation by a DSB-approved national accrediting authority will be a vendor with the state of North Carolina and will accept payments for services provided through an outcome-based program.

DSB has cooperative agreements with eleven CRPs for the provision of long term follow up support services (extended services) to individuals who achieved their goal of employment assistance from the

supported employment program. The CRP meets with the individual based on DSB's phasing system for long term follow up. The contractor provides extended services and ongoing support services through individual contacts on the schedule as listed below. The contractor bills DSB for these contacts and follows the phases of DSB's extended services plan as follows:

Phase 1: Twice monthly contacts with the individual and employer for the first six months of extended services, unless a provision is put in place on the individual's original or amended IPE for off -site monitoring.

Phase 2: At the end of six months, the contractor, individual and employer will make determination as to the individual's stabilization on the job. If ongoing support is required by the individual to maintain employment, ongoing support of two monthly contacts can condition. If and when the individual is determined to be well-stabilized in the employment situation, an offer will be made to the individual and employer that continued monitoring could be made once every six months. If this offer is accepted by the individual and employer, the contractor must continue to monitor in the phase 2 for no less than 24 months. The individual and employer must sign a waiver acknowledging their agreement to this action during this phase.

Phase 3: When the individual has successfully completed phase 2, the contractor may offer the individual and employer an opportunity to cease regular monitoring. If they chose to enter into phase 3, the individual is placed on an inactive list and monitoring would only be at the individual or employer's request. The individual and employer must sign a waiver agreeing to the conditions of phase 3. If the contractor is contacted by either the individual or employer, the contractor will make an on-site visit to determine what services are needed to re-stabilize the individual's job. If the contractor determines that more than minimal services are needed, then the contractor should refer the individual back to the DSB's Vocational Rehabilitation Program for possible case activation. However, if the contractor determines that the issues can be resolved with for example, short term training or educating of staff, the contractor can provide required services to the individual and/or employer.

DSB developed a community-based work adjustment services program with assistance from several community rehabilitation programs (CRP) for eligible individuals who require initial intervention to improve and increase productivity, attendance, punctuality, ability to interact appropriately with coworkers and supervisors, and work tolerance, yet do not require long-term support. CRP's across the state have developed specialized programs for these services that include situational assessments, job placement and job coaching services. Payments are made to the CRP's using an outcome-based format, with increment payments made based on milestones.

DSB also contracts with some nonprofit agencies for the provision of pre-employment transition services. These contracts are procured through a *Request for Applications* (RFA) process in conjunction with the NC Division of Vocational Rehabilitation. There is a team that reviews each proposal to ensure that the application meets the required criteria. The team also performs contract negotiations with each provider. The RFA requires that the agency propose delivery of at least two of the five pre-employment transition services. DSB currently has nine unique contracts in place.

DSB provides the contractor with staff training, consultation and technical assistance, as appropriate. DSB's VR Counselor coordinates individual admissions and subsequent services with the contractor. Consistent with DSB policy, the referring VR counselor provides the contractor with the necessary documents. DSB participates in admissions, attends subsequent staffing, and provides individual rehabilitation counseling and other rehabilitation services to promote the individual's progress while enrolled with the contractor. Individual records will reflect evidence of mutual effort and each party will keep the other informed regarding placement and follow-up activities.

The DSB rehabilitation program specialist meets periodically with the CRP's personnel to provide assistance relative to standards compliance, fiscal accountability, quality of service, individual referrals, and the planning of program services for DSB individuals as identified in the contract.

(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.

DSB arranges for the provision of supported employment services for individuals with the most significant disabilities, including youth, as identified in the response for Description (e) — Cooperative Agreements with Private Nonprofit Organizations. The division utilizes an outcome-based method of purchasing supported employment services from private nonprofit community rehabilitation programs (CRP) for eligible individuals who are determined to have the most significant disabilities and are in need of supported employment. The CRP must meet three requirements: (1) the CRP must be certified by a nationally recognized certification program such as CARF, COA, or Council on Quality Leadership (CQL); (2) the CRP must be a vendor of the state; and (3) the CRP must be willing to accept DSB's milestone payment system. There are five milestones with incentives throughout the entire supported employment process. The five milestones are: (1) Assessment and Planning; (2) Job Development; (3) Job Placement; (4) Stabilization; and (5) Successful Employment. Incentives are provided the employer provides health insurance coverage at little or no cost to the individual, and the individual is eligible to be covered at the time of case closure. The Community Rehabilitation Program provides documentation in the form of a record of service hours provided and case notes from the job coaches to the DSB VR Counselors with each invoice for payment of the milestones. DSB continues to contract for extended services and currently has agreements with CRPs to provide this important service.

(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:

VR services; and

transition services, including pre-employment transition services, for students and youth with disabilities.

DSB will continue to network with employers statewide to provide mutually beneficial services and supports utilizing the dual-customer approach. Services will primarily be provided by vocational rehabilitation counselors and business services representatives/community employment specialists. Staff will be intentional in their efforts to build relationships with employers to learn the nature of their businesses, the educational background and skill sets required of employees and the employers' recruitment needs. DSB will offer services to employers including information regarding the division, disability awareness and sensitivity training, educational information about the American with Disabilities and Workforce Investment and Opportunity Acts, incentives for hiring individuals who have disabilities, work-site assessment services and information on job modifications/accommodations and assistive technology. Employers will be encouraged to partner with DSB to create opportunities for job placement, on-the-job training, internships, work experiences, and supported/customized employment placements for clients. Staff will also provide information regarding benefits to employers that hire individuals with disabilities and assistance in retaining employees who have disabilities.

The principle that individuals with disabilities, including those with the most significant disabilities, can achieve high quality competitive integrated employment, when provided the necessary services and support, is incorporated throughout the Workforce Innovations Opportunity Act. Employment in businesses owned by community rehabilitation providers, group settings, affirmative industries, social enterprises, and other forms of non-traditional work settings will be evaluated by DSB on a case-by-case basis. The evaluation review process will be initiated whenever one or more of the following competitive integrated employment criteria are in question:

- purpose of the business;
- competitive wages;
- integrated location; or
- opportunities for advancement.

DSB will continue to invest in providing training for staff regarding evidence-based best practices pertaining to business engagement. Efforts will be made to create a database to assist us in measuring and tracking our effectiveness in serving employers. Additionally, DSB will develop branded outreach materials to market our services to employers and we will increase participation in local chambers of commerce and business leadership networks to help build stronger relationships with business partners.

(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;

In a combined effort with the NC Division of Vocational Rehabilitation Services (DVRS), the Controller's Office, and Information Technology Services, DSB has established an informational sharing agreement with the Division of Medical Assistance to utilize the NCTracks Medicaid Management Information System for North Carolina. This system helps the division ensure all approved medical cost services are authorized at the appropriate pricing tiers and up to date. DSB and DVRS also have an agreement with the Social Security Administration allowing for the sharing of information on an as needed basis only to assist with presumption of eligibility and provision of services to those with verified disabilities. This information is available in our electronic case management system and every VR staff person that has access to such information must annually complete training pertaining to the Social Security agreement and the confidentiality protocols.

(2) the State agency responsible for providing services for individuals with developmental disabilities

DSB serves individuals who have multiple disabilities and collaborates with the North Carolina Council on Developmental Disabilities, DVRS, Division of Services for the Deaf and Hard of Hearing and the Division of Mental Health, Developmental Disabilities and Substance Abuse Services to help us better understand all disabilities and to provide the most comprehensive, holistic services and to maximize the use of comparable benefits and available resources for eligible clients.

(3) the State agency responsible for providing mental health services.

NCDHHS, Division of Mental Health, Developmental Disabilities and Substance Abuse Services is the state agency responsible for providing mental health services. DSB collaborates with this agency to better understand all disabilities and to provide the most comprehensive, holistic services and to maximize the use of comparable benefits and available resources for eligible clients.

(i) **Comprehensive System of Personnel Development**

Including 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) Data 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:

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;

DSB utilizes a state human resource and payroll system called BEACON which stands for building enterprise access for North Carolina's core operating needs. Reports on staff positions and vacancies are generated from this system. The table below includes the number of personnel employed and needed in the provision of VR services broken down by personnel category. In total, the ratio of VR counselors to eligible individuals served (2,871) by the DSB VR program during PY 2018-2019 was 96/1.

(B) the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category

Job Title	Total Positions
Rehabilitation Counselor I	16
Rehabilitation Counselor II	14
Rehabilitation Counselor in Charge	4
Rehabilitation Admin Counselor I	3
Rehabilitation Supervisor	4
Vocational Evaluator II	1
HR Placement Specialist/Community Employment Specialist	14
Rehabilitation Casework Tech	2
Total	58

(C) Projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in five 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.

There was a slight increase this PY in the total number of eligible individuals served through DSB's VR program. While efforts continue to identify individuals who are visually impaired, blind or deafblind who can benefit from services, including students and youth with disabilities, is not expected that additional FTEs will be granted and funded. It is therefore expected that the projected number of positions will remain the same as noted above during the period covered by this Unified State Plan. Retaining vocational rehabilitation counselors has been more challenging than recruiting them. Most counselors who have left the agency have indicated the reason is to pursue employment with federal and private organizations largely due to being offered higher salaries. Among senior management and area supervisors, DSB has two staff members with more than 25 years of service. We have received workforce transition planning

training and will continue to work with the human resources department in developing our plan to ensure that we maintain qualified personnel to deliver VR services.

(D) 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:

a list of the institutions of higher education in the state that are preparing VR professionals, by type of program

DSB has on-going relationships with four North Carolina universities who currently offer graduate degrees in rehabilitation counseling studies. These include East Carolina University (ECU), A&T State University, Winston- Salem State University (WSSU), and the University of North Carolina at Chapel Hill (UNC-CH). AT&T State and the WSSU programs are historically black universities and were established with the assistance of the Rehabilitation Services Administration (RSA) grant and school funding. Stipends and financial aid assistance are offered to candidates in these programs. The universities and DSB plan to continue partnering to provide internships for students as needed. Winston- Salem State University received funding in 2002 to offer a bachelor's degree in rehabilitation studies, and coursework continues. The master's degree program in rehabilitation studies is designed in coordination with the undergraduate program to encourage these graduates to pursue a master's degree. North Carolina A&T State University has used the structure in existing master's degree programs in guidance and counseling to build the rehabilitation counseling master's degree program. UNC has received an RSA grant to provide a master's degree in psychiatric disabilities and is currently offering four courses as part of their master's program. The following is a list of institutions by program type that currently offer professional training programs for preparing VR professionals:

NC A&T University: Mental Health Counseling - Rehabilitation Program Master's program; Doctor of Philosophy (Ph.D.) Rehabilitation Counseling & Rehabilitation Counselor Education; Certificate in Rehabilitation Counseling & Behavioral Addictions; Certificate in Rehabilitation Psychology & Behavioral Medicine; and Certificate in Vocational Evaluation & Work Adjustment;

Winston- Salem State University: Master of Science in Rehabilitation Counseling with program focus specialization offered in Deaf & Hard of Hearing, Rural Transition, Vocational Evaluation, as well as Public VR;

University of NC at Chapel Hill: Master of Science in Clinical Rehabilitation & Mental Health Counseling;

East Carolina University: Master of Science in Rehabilitation & Career Counseling; Certificate in Rehabilitation Counseling; Certificate in Vocational Evaluation; Certificate in Substance Abuse Counseling; and Certificate in Military & Trauma Counseling.

the number of students enrolled at each of those institutions, broken down by type of program

NC A&T University

- Mental Health Counseling - Rehabilitation Program Master's program: 28 students
- Doctor of Philosophy (Ph.D.) Rehabilitation Counseling & Rehabilitation Counselor Education: 28 students
- Certificate Rehabilitation Counseling & Behavioral Addictions: 10 students
- Certificate in Rehabilitation Psychology & Behavioral Medicine: 1 student
- Certificate in Vocational Evaluation & Work Adjustment: 0 students

Winston- Salem State University

- Master of Science in Rehabilitation: 38 students

UNC at Chapel Hill

- Master of Science in Clinical Rehabilitation & Mental Health Counseling: 47 students

East Carolina University

- Master of Science in Rehabilitation & Career Counseling: 44 students
- Certificate in Rehabilitation Counseling: 14 students
- Certificate in Vocational Evaluation: 17 students
- Certificate in Substance Abuse Counseling: 32 students
- Certificate in Military & Trauma Counseling: 31 students

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.

NC A&T University:

- Mental Health Counseling - Rehabilitation Program Master's program, 5 graduates (1 hired between DVRS and DSB)
- Doctor of Philosophy (Ph.D.) Rehabilitation Counseling & Rehabilitation Counselor Education, 7 graduates
- Certificate Rehabilitation Counseling & Behavioral Addictions, 5 graduates
- Certificate in Rehabilitation Psychology & Behavioral Medicine, unknown
- Certificate in Vocational Evaluation & Work Adjustment: unknown

Winston Salem State University:

- Master of Science in Rehabilitation: 9 graduates

UNC at Chapel Hill:

- Master of Science in Clinical Rehabilitation & Mental Health Counseling: 21 graduates

East Carolina University:

- Master of Science in Rehabilitation & Career Counseling: 5 graduates
- Certificate in Rehabilitation Counseling: 1 graduate
- Certificate in Vocational Evaluation: 4 graduates
- Certificate in Substance Abuse Counseling: 6 graduates
- Certificate in Military & Trauma Counseling: 8 graduates

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.

The Division of the Services for the Blind (DSB) employs the following strategies to ensure that the agency's projected need for qualified staff are met:

Currently, 100 percent of VR program staff meet the education standards for qualified rehabilitation counselor. Individuals who will meet the definition of "qualified rehabilitation counselor" are being recruited for all current vacancies and are hired whenever possible.

DSB offers unpaid internship positions for students in their last semester of a master level degree program in rehabilitation counseling. Offering internships educates students about the needs of individuals who are blind, visually impaired or deafblind and the vocational rehabilitation process. Providing these experiences also strengthens the pool of candidates for employment with DSB. Nationwide recruitment is done by posting positions in NeoGov, an internet human resources application provider for government agencies which has expanded our applicant pool. A section on DSB's website labeled *Career Opportunities,* links browsers to NeoGov listings. Available positions for rehabilitation counselors and orientation and mobility specialists are sent to local colleges to help recruit graduating students for job opportunities. Positions are often posted on LinkedIn and the Academy of Certification of Vision Rehabilitation and Education Programs website. Some positions are shared with CSAVR and NCSAB membership to assist with recruiting. North Carolina recently became the 37th state in the nation to commit to Employment First (EF) for individuals with disabilities. Employment First focuses on the importance of competitive, integrated employment as truly the first choice for individuals with disabilities. By adopting the EF mindset, state agencies are committed to be intentional about addressing barriers to competitive employment and assessing the success of our efforts in increasing the numbers of individuals with disabilities employed by state agencies. On an annual basis, DSB conducts a workforce analysis of its representation of persons with disabilities, of persons of different races and ethnic groups and other demographics in different personnel classifications and occupational categories. Those classifications and occupational categories in which persons with disabilities and minority groups are under-represented are identified, and goals are established to increase representation in DSB's workforce as an equal opportunity employer.

Among senior management and area supervisors, DSB has 2 staff members with more than 25 years of service and one vacancy. We have received workforce transition planning training from HR and will continue to work with them in developing our plan. DSB utilizes NC DHHS leadership training as a point of entrance for pre-supervisory training. DSB conducts leadership/pre-supervisory training to begin to identify staff interested in management opportunities. This effort has led to several staff promotions over the past year.

All rehabilitation counselors are required to complete developmental training in casework requirements and documentation during their first year of employment. The chiefs of rehabilitation and the area and district rehabilitation supervisors provide this training in small groups to directly address agency policies and procedures for professional casework practices. During rehabilitation counselors' first year of employment, their work is closely monitored and reviewed with most actions requiring supervisory approval. After one year of employment, rehabilitation counselors who meet certain standards may request promotion to independent counselor status, rehabilitation counselor II. Evaluation procedures for this status consist of a written and oral examination of casework policies and procedures, caseload review and audit, and review of contact with caseload eligible individuals to assess the quality and satisfaction of services. The chief of rehabilitation field services administers and reviews all aspects of the examination process. Counselors are also required to participate in a week-long adjustment to blindness training which is designed to increase knowledge regarding working with individuals who have significant vision loss. There are also other training opportunities available for VR counselors throughout the year to enhance their skill levels in working with clients and related parties.

Training efforts through staff development are on-going throughout the year for VR staff. In 2018, the following trainings were provided to VR staff:

Vocational Rehabilitation

Training Activity	Targeted Attendees
New Employee-related training (NEST, NELVT, etc.)	New employees (approximately 40 annually)

NRTC Improving Business Development Skills	VRC/BSR/CES/Supervisors/Program Specialists.
Best Practices for New Counselors	New VRC's (approximately 5-10)
Supervisor / SERT training	All Program Chiefs / Supervisors - 7 (VR Program)
NCCVIB	30 VR staff attending
NCETA Conference	VRC / BSR /CES – 8 employees attending
NCRA Conference	15 VRC
NCATP Training	15 staff (AT & VR)
NCWorks Partnership Conference	20 staff
Annual In-Service (BEAM / ENCORE) position-related training	VRC / TRC; BSR / CES; AT; DB Specialists; PA
Vocational Rehabilitation Supervisor Training	University of Arkansas Currents; Center for Continuing Education in Rehabilitation
Supervisory / Leadership Development	ASM; LAAL; National Conferences; Facilitating Career Development (CSAVR, NCSAB, ADA Coord, NCAPSE)
Facilitating Career Development	NC Commerce
RCB Trainings	CPR; On Course; Annual In-Service; Specialized AT training: 1-Touch, etc.
Misc. Conferences	SERID, NC Beach Conference, Substance Use Conference, HKNC Training, International Orientation & Mobility Online Symposium, Network of Americas Conference

DSB utilizes NC DHHS leadership training as a point of entrance for pre-supervisory training. Additionally, three staff who were in counselor-in-charge positions participated in the Vocational Rehabilitation Supervisor Academy offered through the Center for Continuing Education of Rehabilitation through the University of Washington and Arkansas Currents in 2018. One of the participants has since been promoted to an area supervisor position. DSB also conducts leadership/pre-supervisory training to begin to identify staff interested in management opportunities. This effort has led to several staff promotions over the past year as well.

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) and to ensure that designated state unit professional and paraprofessional personnel are adequately trained and prepared, including:

Standards that are consistent with any national or state-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services.
The 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.

As of December 21, 2009, all employees in the rehabilitation counselor role have met the CSPD mandate. Although the mandate has been lifted, DHHS has not at this time changed its policies regarding minimum requirements for the VR counselor position but is investigating whether lowering the educational standard for VR counselors to the minimum credentialing specified in the Workforce Innovation and Opportunity Act is necessary and beneficial to VR clients. Currently, employees that do not meet the minimum education requirements serve in trainee status and not function as a rehabilitation counselor and must progress toward attaining the necessary requirements outlined in a memorandum of agreement within the specified timeframe. If the employee does not meet the specified requirements or they are not progressing at an acceptable rate, the employee is separated during their probationary status period.

The average number of qualified applicants referred for vocational rehabilitation counselor vacancies between October 1, 2017 and September 30, 2018 was 12 and for the time period of October 1, 2018 and September 30, 2019, the average was 9.4 reflecting that recruitment for rehabilitation counselor I and rehabilitation counselor II positions has not been as challenging as in previous years. DSB's current minimum education and experience requirements for vocational rehabilitation counselors and trainees are as follows:

Minimum Education and Experience for vocational rehabilitation counselors -
Master's degree in rehabilitation counseling from an appropriately accredited institution; or a master's degree in a related human services field from an appropriately accredited institution; or current certification as a certified rehabilitation counselor by the Commission of Rehabilitation Counselor Certification.

Minimum Education and Experience for vocational rehabilitation counselor trainees -
Bachelor's degree in rehabilitation counseling or a related human services field from an appropriately accredited institution. An employee in the progression is eligible to be placed in the full class of rehabilitation counselor upon completion of a master's degree in rehabilitation counseling. The three-year progression may be extended as needed for an employee who is making satisfactory progress toward the attainment of the master's degree.

Between 2016 and 2018, four employees were enrolled in rehabilitation counseling programs as RSA scholars. Two of them had to complete this coursework to meet the minimum educational requirements for employment. These employees were enrolled at Auburn University and Winston-Salem State University. One of these employees was recently promoted to a counselor-in-charge position. The two other DSB employees, who were not vocational rehabilitation counselors at the time of enrollment, also became RSA scholars in rehabilitation counseling programs; one at Auburn and one at Winston-Salem State University. They have successfully completed their rehabilitation counseling programs.

Staff Development.

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated state unit receive appropriate and adequate training in terms of:

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.

Refer to Description (i)(2) – Plan for Recruitment, Preparation and Retention of Qualified Personnel for additional information.

DSB has had at least one employee each year enrolled in the Career Development Facilitator training offered by the NCWorks Training Center since 2016. Facilitating Career Development (FCD), formerly titled Career Development Facilitator (CDF), is comprised of 120 hours of coursework and provides individuals with the relevant skills and knowledge needed to assist others in planning careers and obtaining meaningful work. The FCD course uses the National Career Development Association's (NCDA) curriculum, designed to standardize the knowledge and experience of individuals who work in a career development setting. This course has value for both front-line personnel and program administrators who provide or manage career development services.

As of 2017, in coordination with the Office of State Human Resources, several DSB employees have completed coursework in the *Leading at all Levels* curriculums for individual contributors and supervisors. Additionally, during the 2017 calendar year, 15 employees participated in and received three-year certificates in Mental Health First Aid.

DSB provided several mandatory trainings focused on WIOA and pre-employment transition services for rehabilitation counselors, supervisors, specialists, business service representatives and community employment specialists, including introductions to the changes in definitions, policies and reporting requirements. Beginning in May 2017, DSB became one of four states to participate in training and research from the National Research and Training Center on Blindness and Visual Impairment (NRTC) "Improving Business Development Skills." As a participating state, case carrying VR counselors responded to quarterly surveys pertaining to their business development activities. In February 2018, staff from the NRTC and an external trainer from a state with documented success in the dual customer approach to business development provided an intensive three-day training for rehabilitation counselors, supervisors, job development staff and deafblind specialists. Following the training, rehabilitation counselors continued completing quarterly surveys for approximately nine months as part of the research project. Additionally, the NRTC provided technical assistance to DSB administration.

DSB has an ongoing comprehensive system for personnel development that provides all staff classifications with appropriate job-related training. Staff members complete *Learning Request* forms yearly to identify specific training needs. The program specialist for staff development analyzes the learning requests, and then plans specific training activities to meet the identified needs. Because of these requests, training has been provided in an array of training events with relevant curriculum and skills acquisition experiences. DSB has participated in intensive training sessions this year, including attendance at the annual NCWorks Partnership Conference and annual business engagement training for specific HR placement and community employment specialists. Other job development trainings staff participated in include Windmills training and *Improving Business Development Skills* training.

DSB staff also participated in the following training: Administrative Professionals Certificate Training; Assistive Technology; Best Practices for DSB's New Rehabilitation Counselors; Business Service Representative Training; Community Collaboration and Training Forum; CPR Training; CFNC.ORG Training Sessions; DHHS Leadership Training; Employment Opportunities Professional Training; National Equipment DeafBlind Training Program; National Transition Conference; New Employee Sensitivity Training; North Carolina Conference on Visual Impairment and Blindness (NCCVIB) in collaboration with Governor Morehead School for the Blind, and the NC Department of Public Instruction; North Carolina Deaf Blind Association Conference; Pre-Supervisory Training; Professional and Personal Development;

Rehabilitation Center and Evaluation Unit Annual Training; Teaching Financial Literacy; Workplace Violence Prevention. DSB has maintained the authority granted by the Commission on Rehabilitation Counselor Certification to provide Certified Rehabilitation Counselor Credits (CRC) for all certified rehabilitation counselors who participate in approved training provided by the division. The agency also has the authority to grant Continuing Educational Units (CEU) by the Academy of Certification of Vision Rehabilitation and Education Programs (ACVREP). DSB staff are also routinely alerted to and complete other on-line training events provided by sponsors such as, WINTAC, NCWorks and the ADA National Network.

Procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

DSB requires professional skills in rehabilitation counseling, blind rehabilitation, customer service and business relationship development to enhance client employment opportunities. Attention is given to knowledge translation: a process which includes knowledge dissemination of evidence-based and best practices derived from the results of rigorous research. The program specialist for employment services assists in the provision of comprehensive training on these subjects to all newly hired VRCs and VR program staff responsible for job development and placement. Follow-up training and one-on-one coaching is available to staff not meeting performance objectives. The extensive information, resources and technical assistance available from the various technical assistance centers and demonstration projects is also disseminated to DSB VR staff. DSB staff have benefited from technical assistance, research and resource information and in-person and webinar trainings provided by WINTAC regarding pre-employment transition services, customized employment, integrated resource team/community academy development, increased integration of DSB into the workforce development system, business engagement and transition to the common performance outcome measures.

A library of rehabilitation resources is maintained in the state office. The staff development program specialist continually reviews available materials for the library, identifies and purchases current information relevant to VR and to vision-related topics. Areas specifically addressed in the learning requests are targeted in this search of materials. These books and materials are available in regular and adapted formats and can be checked out from the library by any staff member across the state. Equipment is also purchased and maintained to enhance training programs, presentations, and small group work.

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.

DSB has personnel and utilizes interpreters or translators to communicate in the native/preferred language of applicants or eligible individuals who have limited English speaking ability.

The capability to produce Braille is available in all seven district office locations. Information can also be produced in large print for distribution as needed in the district offices with use of existing computer equipment. Mass production of braille and large print material is done by the specialized communications unit, located at DSB's state office to support DSB's employees who are blind or visually impaired. Computer workstations equipped with assistive technology are also available for consumer use within each district office. DSB has placed the policy and procedures manual on DSB's website. The website currently contains information about all DSB's programs, frequently used forms, links to resources, the local office locations, and the staff directory.

DSB has a specialized program for persons who have both vision and hearing loss. The program consists of five specialists to serve the district offices and a statewide program specialist who manages the activities of

this program. Each member of this program is skilled in use of sign language to enhance communication. The consultants work very closely with rehabilitation counselors on all cases where individuals have any degree of both vision and hearing loss. They provide information regarding specialized needs of these individuals, the availability of resources, and the arrangement of appropriate communication. This collaboration ensures the individual has the opportunity for maximum participation in a rehabilitation program of services that will lead to successful employment. DSB maintains a list of approved interpreters and dedicated funding for interpreting services through DHHS resources. A list of qualified sign-language interpreters is maintained in each office, and these can be hired as required to enhance communication. Language interpreters are sought and hired to facilitate communication with individuals for whom English is not their primary language.

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.

DSB works with DPI to ensure all students who are blind, visually impaired, or deafblind have access to VR services while attending public school. DSB has nine memorandums of agreements with school systems to provide transition programs for their students. These programs work with students, the school staff, and the parents or guardians as the student transitions from school to work and continues working with them until they achieve their employment goals. The specialized programs are in the following school systems: Brunswick County, Charlotte-Mecklenburg County, Cumberland County, Guilford County, New Hanover County, Onslow County, Pender County, Wake County Schools, Winston-Salem-Forsyth County Schools and the Governor Morehead School for the Blind. Each program consists of a rehabilitation counselor and a community employment specialist who are trained to work with students during their transition from school to work.

All rehabilitation counselors have received training on IDEA. Rehabilitation counselors in the district offices develop relationships with school systems and with teachers who serve students with blindness or visual impairments in their coverage area. They participate as members of the school's individualized education program (IEP) team as a provider of transition services for students who are blind or who are visually impaired. Consultation is provided to all rehabilitation counselors who include students on their caseload. The program specialist and the specialized transition counselors are available to advise counselors in areas such as participation on the IEP team and location of specialized resources for students as they transition from school to work.

DSB provides additional specialized services for students, such as the summer youth programs at the Rehabilitation Center for the Blind. One program called "SAVVY" (Summer Adjustment to Blindness Vital to Visually Impaired Youth) World of Work provides career exploration, paid internships with job coaching, interviewing skills and counseling provided by DSB staff. One program, "SAVVY" Youth in Transition provides a classroom setting and field trips to develop skills and confidence for greater independence, specific life skills, basic living skills, social development, vocational and study skills and independent living. Another program called "SAVVY" College Prep provides "college survival skills," such as independent study habits and maximum use of any assistive technology.

In addition, DSB often provides Youth Mini Centers in the communities throughout the state in coordination with the VR transition program staff and the independent living rehabilitation staff for those students who cannot attend one of the center programs. These programs focus on direct requests of the youth in that area and may include local recreational offerings, activities of daily living instruction, O&M, assistive technology evaluation and training, banking, college tours and much more.

A rehabilitation program specialist is assigned to coordinate transition services to ensure all students have access to DSB's VR services while in high school. The school systems with transition programs renew their cooperative agreements for funding and the transition program specialist coordinates the involvement of the local DSB staff, the school staff, and DSB's financial officers to ensure these agreements are complete and accurate.

(j) **Statewide Assessment**

Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the state, particularly the VR services needs of those:

with the most significant disabilities, including their need for supported employment services.

Individuals with most significant disabilities (MSD) are defined as those whose physical or mental impairments require interventions or permanent accommodations that cannot be easily achieved to mitigate their limitations in three or more functional capacities regarding employment, such as communication, interpersonal skills, mobility, self-care, self-direction, work skills, and work tolerance. For the disabling condition to meet the definition of "most significant," such individuals must either require multiple core VR services for a minimum of nine months to complete their vocational rehabilitation program or require personal assistance services, rehabilitation technology, or extended services for their employment.

In program year 2018-19, Individuals with MSD accounted for 610 (21.2%) of 2,871 eligible DSB VR consumers served.

Within this population, 257 (42.1%) were individuals whose primary disability was blindness, 325 (53.3%) were individuals with other visual impairments as their primary disability, 20 (3.3%) had deafblindness as their primary disability (another 10 individuals had deafblindness as a secondary disability), and eight (1.4%) had another type of disability as their primary impediment to employment.

Individuals with MSD ranged in age from 13 to 79, with 38 as both the median and average age. Of the 610 eligible VR consumers with MSD, 165 (27%) were transition age youth, younger than 25; 306 (50.2%) were ages 25 to 54; and 139 (22.8%) were age 55 or older.

About half the individuals with MSD were female (n = 303) and half were individuals of minority backgrounds (n = 306), with Black or African American accounting for 42.6 percent and Hispanic or Latino accounting for 6.4 percent.

The services provided most for this population in PY 2018-19, as an indication of their rehabilitation service needs, were assessment and evaluation services, which were provided to 469 individuals (76.9%); counseling and guidance, which was provided to 320 individuals (52.5%); rehabilitation technology, which was provided to 178 individuals (29.2%), diagnosis and treatment of impairments, which was provided to 122 individuals (20%); and transportation, which was provided to 103 individuals (16.9%). Other services provided are listed in table J.1.

Table J.1. Services provided for Individuals with MSD, PY 2018-19

Service Type	Number of clients that received the service	Percent of MSD population served
Assessment and evaluation services	469	76.9%
Counseling and guidance	320	52.5%

Service Type	Number of clients that received the service	Percent of MSD population served
Rehabilitation technology	178	29.2%
Diagnosis and treatment of impairments	122	20.0%
Transportation	103	16.9%
Job search assistance	87	14.3%
Job placement assistance	77	12.6%
Disability related skills training	72	11.8%
Information and referral services	60	9.8%
Maintenance	51	8.4%
Job readiness training	36	5.9%
College or university training	32	5.2%
Supported employment services	31	5.1%
Community college training	30	4.9%
Technical assistance	21	3.4%
Literacy training	20	3.3%
Miscellaneous training	18	3.0%
Vocational training	11	1.8%
Graduate school training	10	1.6%
Interpreter services	10	1.6%
Short term job supports	9	1.5%
On the job training	8	1.3%
Reader services	3	0.5%
Benefits counseling	2	0.3%
Customized employment services	1	0.2%
Customized training	1	0.2%
Personal assistant services	1	0.2%

In a survey of 671 rehabilitation professionals, responses as to the needs of individuals with most significant disabilities were provided by 296 survey participants. Of the valid responses, 77 (26.1%) reported a need for rehabilitation technology and adaptive devices; 57 (19.3%) reported transportation; 55 (18.6%) reported a need related to employer training assistance; 43 (14.6%) reported a need for job readiness related training; and 25 (8.5%) reported a need for additional staff training, such as at CRPs or the DVRS VR program. Other needs included advocacy services, interpreters, CRP assistance, and improvements to the overall service delivery system.

Minorities

Individuals who are of a minority race or ethnicity accounted for 1,552 (54%) of 2,871 eligible DSB VR consumers served in PY 2018-19.

Within this population 273 (17.6%) were individuals with MSD; 973 (62.7%) were individuals with significant disabilities; and 273 (17.6%) did not have significant disabilities.

Regarding their disability, 487 (31.4%) had blindness as their primary impairment; 1,028 (66.2%) had a visual impairment other than blindness; 19 (1.2%) were deafblind; and 18 (1.2%) had a disability other than vision as their primary impediment to employment.

Individuals of minority backgrounds ranged in age from 13 to 78, with 43 as the average age. Of the 1,552 eligible VR consumers of minority backgrounds, 257 (16.6%) were transition age youth, younger than 25; 812 (52.3%) were ages 25 to 54; and 483 (31.1%) were age 55 or older.

About 53 percent of the individuals with minority backgrounds were female (n = 821).

The minority backgrounds of this population included 1,323 (85.2%) who were Black or African American; 171 (11%) who were Hispanic or Latino; 47 (3%) who were American Indian or Alaskan Native; 37 (2.4%) who were Asian; and 12 (< 1%) who were Native Hawaiian or Other Pacific Islander.

The services provided most for this population in PY 2018-19, as an indication of their rehabilitation service needs, were assessment and evaluation services, which were provided to 1,174 individuals (75.6%); counseling and guidance, which was provided to 627 individuals (40.4%); diagnosis and treatment of impairments, which was provided to 398 individuals (25.6%); rehabilitation technology, which was provided to 331 individuals (21.3%), and transportation, which was provided to 193 individuals (12.4%). Other services provided are listed in table J.2.

Table J.2. Services provided for Individuals of Minority Backgrounds, PY 2018-19

Service Type	Number of clients that received the service	Percent of minority population served
Assessment and evaluation services	1,174	75.6%
Counseling and guidance	627	40.4%
Diagnosis and treatment of impairments	398	25.6%
Rehabilitation technology	331	21.3%
Transportation	193	12.4%
Job search assistance	165	10.6%
Job placement assistance	164	10.6%
Maintenance	121	7.8%
Disability related skills training	96	6.2%
College or university training	78	5.0%
Information and referral services	69	4.4%
Job readiness training	54	3.5%
Community college training	46	3.0%

Service Type	Number of clients that received the service	Percent of minority population served
Technical assistance	38	2.4%
Literacy training	32	2.1%
Miscellaneous training	25	1.6%
Supported employment services	24	1.5%
Vocational training	16	1.0%
Short term job supports	15	1.0%
Graduate school training	14	0.9%
Interpreter services	14	0.9%
On the job training	12	0.8%
Reader services	5	0.3%
Benefits counseling	2	0.1%
Customized employment services	2	0.1%
Customized training	2	0.1%

Unserved or underserved by the VR program;

There is no regulatory definition for individuals who have been unserved or underserved by the VR program. The federal guidance for establishing this category is that it can be defined from a comparison of the demographics of individuals served by the VR program with those of the population of individuals with disabilities residing in the state or from the results of a survey or key informant interviews.

The demographics of the population of the 2,871 eligible individuals served by the DSB VR program in PY 2018-19 are as follows:

Minority race and ethnicity: 1,552 (54.1%) were of a minority race or ethnicity, the distribution of which is described in the previous section.

Gender: 1,460 (50.9%) were female.

Age at the start of the program year: The age range was from 13 to 86. The average age was 43 and the median age was 45. 562 (19.6%) were transition-age youth younger than 25; 1,406 were adults ages 25 to 54; and 903 (31.5%) were adults ages 55 and older.

Significance of disability: 610 (21.2%) were individuals with MSD; 1,727 (60.2%) were individuals with a significant disability; and 534 (18.6%) were individuals whose disability was not significant.

Primary impairment: 873 (30.4%) with blindness; 1,930 (67.2%) with another visual impairment; 42 (1.5%) with deafblindness or hearing impaired; 26 (1%) had another disability as the primary impairment and blindness or a visual impairment was secondary.

Comorbidity: 1,498 (52.2%) had a secondary disability, of which 1,008 (67.3%) had a physical impairment other than orthopedic that in most all cases was not specifically listed; 168 (11.2%) had a psychosocial or other mental impairment; 95 (6.3%) had an orthopedic impairment; 87 (5.8%) had a cognitive impairment

such as an intellectual or learning disability; 67 (4.5%) had deafness or hearing-loss; the remaining 4.9 percent had blindness or a visual impairment as the secondary disability.

In a survey of 671 rehabilitation professionals, specific populations of underserved individuals with blindness or other visual impairments were identified in 33 of the responses. These groups included people living in rural areas (17 responses); individuals with comorbidity, including deaf-blind and people with intellectual disabilities (5 responses); individuals on SSI or SSDI (3 responses); and there was one mention each of people who are completely blind; individuals with cataracts; individuals of low-income; ex-offenders; immigrants; minorities; individuals who are homeless; youth; and seniors. The most commonly mentioned or barrier to employment was transportation, mainly for individuals living in rural areas. Benefits counseling was thought to be a need for individuals receiving SSI or SSDI. Individuals with multiple disabilities were thought to require more assistive technology, including communication devices for individuals who are deafblind or also have intellectual disabilities. For this population, there was also a need for various type of training for service providers, employers and clients. Capacity building and workforce partnerships was a theme across all groups, especially regarding the need for more services, outreach, and employment opportunities in rural areas and a more general need for employer education and community awareness.

> who have been served through other components of the statewide workforce development system

Over half the individuals served by the DSB VR program are also served through other components of the workforce development system. Over a 10-year period, from PY 2008-09 to PY 2017-18, the DSB VR program served 10,191 unique individuals, as reported to the NC Common Follow-up System, of which, at some point during the 10-year period, 5,224 (51.3%) had also received services through NCWorks Career Centers under the Title I Adult, Youth, or Dislocated Worker programs or Title III, Wagner-Peyser.

In a survey of Workforce Development Board Directors from the Kerr-Tar, Western Piedmont, Capital Area, and Charlotte Works Workforce Development Board regions, as key informants, the rehabilitation needs of individuals with blindness and visual disabilities were identified as follows: assistive technology, including Zoom and other adaptive software, braille signage, transportation assistance, and work-based learning opportunities.

> who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

Transition age youth, ages 14-24, comprise 19.4% (n = 589) of the 3,037 total individuals served by the DSB VR program in PY 2018-19, including potentially eligible students with disabilities and individuals who applied for VR services but had not been determined eligible by the end of the program year. Within this youth population, 350 (59.4%) of the 589 transition-age youth were ages 14-21 at the start of the program year and were identified as students with disabilities at either application to the VR program or the start date of their pre-employment transition services; however there were only two (2) potentially eligible students with disabilities that were provided pre-employment transition services and had not applied for VR services and 26 (4.4%) had not been determined eligible by the end of the program year. Of the 589 transition-age youth, 297 (50.4%) were female.

Of the 563 that had been determined eligible for VR services, 166 (28.2%) were individuals with MSD, 340 (57.7%) had significant disabilities, and 57 (9.7%) did not have significant disabilities. Within this group, 210 (35.7%) had blindness as their primary disability, 338 (57.4%) had another visual impairment, 13 (2.2%) were deafblind, and two (< 1%) had an intellectual disability as their primary impairment.

The services provided most for transition-age youth in PY 2018-19, as an indication of their rehabilitation service needs, were assessment and evaluation services, which were provided to 419 individuals (71.1%); counseling and guidance, which was provided to 244 individuals (41.4%); rehabilitation technology, which was provided to 160 individuals (27.1%); academic training at a four-year college or university, which was

provided to 119 individuals (20.2%); transportation, which was provided to 94 individuals (16%); and maintenance supports, which were provided to 77 students (13.1%). Other services provided are listed in table J.3.

Table J.3. VR Services provided for Transition-age Youth, PY 2018-19

Service Type	Number of clients that received the service	Percent of transition-age youth population served
Assessment	419	71.1%
Counseling and Guidance	244	41.4%
Rehabilitation Technology	160	27.2%
University Training	119	20.2%
Transportation	94	16.0%
Maintenance	77	13.1%
Other Services	61	10.4%
Disability Related Skills Training	59	10.0%
Community College	58	9.8%
Job Placement Assistance	52	8.8%
Job Search Assistance	45	7.6%
Job Readiness Training	32	5.4%
Diagnosis and Treatment of Impairments	31	5.3%
Information and Referral Services	29	4.9%
Technical Assistance	22	3.7%
Literacy Training	16	2.7%
Miscellaneous Training	15	2.5%
Supported Employment Services	15	2.5%
Graduate School Training	14	2.4%
Short Term Job Supports	12	2.0%
Interpreter Services	7	1.2%
On-the-Job Training	7	1.2%
Customized Employment Services	4	0.7%
Benefits Counseling	2	0.3%
Customized Training	2	0.3%
Vocational Training	2	0.3%

Within the population of 350 students with disabilities, ages 14-21, 227 (64.9%) were provided pre-employment transition services during the program year: 165 (47.1%) were provided work readiness training; 127 (36.3%) were provided job exploration counseling; 116 (33.1%) were provided a work-based learning experience; 88 (25.1%) were provided counseling on postsecondary enrollment opportunities; and 85 (24.3%) were provided self-advocacy training.

The number of students provided pre-employment transition services during the program year (n = 227) approximates the number of students in secondary education with a visual impairment, including blindness and deafblindness, identified by the *North Carolina Department of Public Instruction's April 2017 Child Count by Grade and Disability* (n = 240), however, the American Community Survey Five-year Public Use Microdata Sample for 2012-2016 estimated 8,700 students, ages 14-21, in secondary or postsecondary education that have "serious difficulty seeing even when wearing glasses." Although this is a self-reported survey estimate subject to a margin of error, the difference suggests there many potentially eligible students in North Carolina, beyond those identified under IDEA, that may benefit from pre-employment transition services.

In a survey of rehabilitation professionals, 179 (26.7%) of 671 survey participants identified one or more needs for transition-age youth. The need most frequently identified was job training, which was mentioned in 47 (26.3%) of the responses; 40 (22.3%) responded that the needs of individuals with visual disabilities were largely the same as youth with disabilities, in general, and included pre-employment transition services, such as job readiness training and work-based learning experiences; 21 (11.7%) identified a need for assistive technology; and 16 (8.9%) identified a need for transportation. Other themes regarding client needs included employment opportunities; improved communication among service providers; training for service providers and employers on accommodations and communication; and family supports.

Identify the need to establish, develop, or improve community rehabilitation programs within the State

The Community Rehabilitation Programs (CRPs) directly provide or facilitate the provision of VR services, such as community-based assessments, job development, training, and job coaching for short-term job supports and supported employment services. In PY 2018-19, of DSB eligible VR clients served, 27 (< 1%) were provided short-term job supports and 40 (1.4%) were provided supported employment services. This small population mostly includes individuals with significant or most significant disabilities and comorbidity of a cognitive or psychosocial impairment.

In a survey of rehabilitation professionals, 465 (69.2%) of 671 identified one or more needs with regard to establishing, developing, or improving CRPs in North Carolina. These needs, however, were not specific to services for individuals with visual impairments, but addressed the need for CRPs, in general. The most frequently identified need was staff training, which was mentioned in 220 (47.3%) of the responses; shortages in some areas, especially rural counties, which was mentioned in 128 (27.5%) of the responses; and communication among providers, including between CRPs and state agencies, which was mentioned in 123 (26.5%) of the responses. Other themes, more specific to individuals with visual impairments, included training for CRP staff on how to better serve the DSB population and the use of assistive technology, especially for individuals who are blind or deafblind.

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 .

Within the population of 350 students with disabilities, ages 14-21, 227 (64.9%) were provided pre-employment transition services during the program year: 165 (47.1%) were provided work readiness training; 127 (36.3%) were provided job exploration counseling; 116 (33.1%) were provided a work-based

learning experience; 88 (25.1%) were provided counseling on postsecondary enrollment opportunities; and 85 (24.3%) were provided self-advocacy training.

The number of students provided pre-employment transition services during the program year (n = 227) approximates the number of students in secondary education with a visual impairment, including blindness and deafblindness, identified by the *North Carolina Department of Public Instruction's April 2017 Child Count by Grade and Disability* (n = 240), however, the American Community Survey Five-year Public Use Microdata Sample for 2012-2016 estimated 8,700 students, ages 14-21, in secondary or postsecondary education that have "serious difficulty seeing even when wearing glasses." Although this is a self-reported survey estimate subject to a margin of error, the difference suggests there many potentially eligible students in North Carolina, beyond those identified under IDEA, that may benefit from pre-employment transition services.

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Refer to Description (d)(1) and (2) – Coordination with Education Officials

(k) **Annual Estimates**

Describe:

The number of individuals in the State who are eligible for services.

DSB 's VR program projects an average of 2,900 individuals with a visual disability who have been determined eligible for DSB VR services, exclusive of pre-employment transition services, will be in-service with the VR-blind program in each of the program years, 2020 through 2024. This estimate includes (a) cases where purchased services are provided in accordance with the consumer's individualized plan for employment; (b) cases where purchased services are provided toward the development of the consumer's individualized plan for employment (e.g., diagnostic and assessment services provided by a community rehabilitation program); and (c) cases where services are provided in-house by agency staff or as a comparable service or benefit.

The number of eligible individuals who will receive services under:

The VR Program;

Of this annual average population of 2,900 individuals eligible for VR services, the DSB's VR-program projects 2,750 will be served under individualized plan for employment, and 1,250 will receive direct cost services provided with funds under the basic support grant for PY 2020-2024.

The Supported Employment Program; and

The DSB VR program will fund supported employment services through the Title I Part B (basic support grant) and does not expect to have a separate supported employment program funded under Title VI.

each priority category, if under an order of selection.

The DSB VR program is not currently under an order of selection and does not expect to implement an order of selection during federal fiscal years 2020-2024.

The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

Not applicable. The DSB VR program is not currently under an order of selection and does not expect to implement an order of selection during federal fiscal years 2020-2024.

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.

For federal fiscal years 2020-2024, the DSB VR program projects average annual expenditures of approximately $3.75 million for purchased services, exclusive of pre-employment transition services, for 1,250 individuals eligible for VR services. This averages to $3,000 per eligible individual for whom cost services will be purchased, inclusive of supported employment services

(l) **State Goals and Priorities**

The designated state unit must:

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 goals and priorities in this section were developed in consultation with the DSB State Rehabilitation Council. (pending SRC approval).

Identify the goals and priorities in carrying out the VR and Supported Employment programs.

Priority: Competitive integrated employment

Goal: Increase competitive integrated employment opportunities and outcomes for individuals with visual disabilities, particularly those with most significant disabilities, underserved populations, and individuals with additional barriers to employment.

Goal: Increase opportunities for training and employment services for adults with visual disabilities, particularly those with most significant disabilities, and underserved populations.

Priority: Youth and students with disabilities

Goal: Increase opportunities for training and employment services for youth with visual disabilities.

Goal: Increase the provision of pre-employment transition services for students with visual disabilities.

Priority: Business engagement

Goal: Build stronger relationships and partnerships with businesses and government agencies to develop or expand work experiences, internships, and employment opportunities for adults and youth who are blind, visually impaired or deafblind.

Priority: Capacity building

Goal: Increase internal capacity and develop the program infrastructure needed to improve service delivery for VR participants and employers.

Goal: Increase collaboration with core WIOA and required program partners and community stakeholders to integrate and expand services for individuals with visual disabilities.

Priority: Supported Employment

Goal: Increase outreach to identify individuals who are most significantly disabled and require supported employment services to achieve a successful competitive integrated employment outcome, including outreach to consumers who reside in rural areas who may also be underserved.

Goal: Provide supported employment training for new counselors.

Goal: Continue efforts to identify and expand the number of community rehabilitation program providers focusing on areas across that state that have limited resources.

Ensure that the goals and priorities are based on an analysis of the following areas:

the most recent comprehensive statewide assessment, including any updates;

The goals and priorities were developed following an analysis of the most recent comprehensive statewide assessment survey and review of administrative data.

the State's performance under the performance accountability measures of section 116 of WIOA; and

The goals and priorities were developed to improve the state's performance under the performance and accountability measures.

other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

The goals and priorities were developed with input from the SRC to improve the operation and effectiveness of the VR program, especially with regard to improving employment outcomes for individuals with visual disabilities, increasing the provision of pre-employment transition services to youth, building internal agency capacity and collaboration with WIOA partner programs, and increasing business engagement.

(m) **Order of Selection**

Describe:

Whether the designated State unit will implement and order of selection. If so, describe:

The order to be followed in selecting eligible individuals to be provided VR services.
The justification for the order.
The service and outcome goals.
The time within which these goals may be achieved for individuals in each priority category within the order; and
How individuals with the most significant disabilities are selected for services before all other individuals with disabilities.

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.

The DSB VR program does not expect to implement an order of selection during federal fiscal years 2020-2024.

(n) **Goals and Plans for Distribution of title VI Funds**

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 DSB VR program will fund supported employment services through the Title I basic support grant and does not expect to have a separate supported employment program funded under Title VI, Part B funds. Our most recent comprehensive statewide needs assessment was completed in 2019 and the findings were considered in developing the following supported employment goals for the period covered by this Unified State Plan.

1. In program year 2018-19, individuals who are most significantly disabled accounted for 610 (21.2%) of the 2,871 eligible DSB VR consumers served. DSB will conduct outreach to increase the number/percentage of eligible individuals served who are most significantly disabled and require supported employment services to achieve a successful competitive integrated employment outcome, including outreach to consumers who reside in rural areas who may also be underserved.

2. Vocational rehabilitation counselors will continue to be provided supported employment training to help them identify and refer individuals with the most significant disabilities for supported employment.

3. The DSB program specialist for supported employment services will continue efforts to identify and expand the number of community rehabilitation program providers focusing on areas across that state that have limited resources.

4. DSB will continue to provide sensitivity and awareness training for community rehabilitation program staff and supported employment service providers pertaining to working with individuals who are blind or have visual impairments.

Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:

the provision of extended services for a period not to exceed four years; and

As incorporated into its policies concerning supported employment services, the DSB VR program first provides on-going support as appropriate for supported employment. Ongoing support includes services: (a) needed to support and maintain the individual in SE that are (b) based on a determination by the VR counselor of the individual's needs as specified in an IPE; and (c) furnished from the time of job placement until transition to extended services, except as provided in post-employment status and, following transition, by one or more extended service providers throughout the individual's term of employment in a particular job placement or multiple placements, if those placements are provided under a program of transitional employment.

At the time of transition to extended services from an extended services provider, the VR program ensures through its contracts, agreements, and policies that extended services are provided by a state agency, a private nonprofit organization, through natural supports or any other appropriate resource other than VR, after the individual has made the transition from the state VR support. Extended services begin when (a) the individual is employed, (b) intensive training is completed, and (c) stabilization on the job has occurred. Individuals may be served for as long as there is a reasonable expectation that an extended services source will be identified during the course of rehabilitation. The DSB VR Program will only contract with supported employment service providers that give written commitment that they will provide extended services compliant with Federal regulations.

Ongoing support provided during extended services must include a minimum of twice-monthly monitoring at the work site to assess job stability unless under special circumstances, especially at the request of the

individual, the IPE provides for off-site monitoring and based upon that assessment, the coordination or provision of specific services at or away from the work site, that are needed to maintain employment stability. If off-site monitoring is determined to be appropriate, it must, at a minimum, consist of two (2) face-to-face meetings with the client and one employer contact monthly. These activities apply to all supported employment clients and not only those whose services are provided through funds reserved pursuant to section 603(d), for youth with the most significant disabilities.

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.

The Division of Services for the Blind (DSB) VR program is collaborating with community rehabilitation programs and other agencies and organizations to provide extended services and expanded supported employment opportunities for youth with the most significant disabilities. Because the DSB VR program will only utilize community rehabilitation programs that give written commitment that they will provide extended services compliant with federal regulations as supported employment vendors, many of those community rehabilitation programs providing SE services also provide extended services under their service contract at no additional cost to the Division when other resources for extended services are not available. The *Request for Application* (RFA) is one of the key tools utilized for contract and program development, in which the entity submitting the application has completed much of the foundational work in leveraging and braiding resources from other public and private funds. And, through its continued participation on interagency committees and collaboration efforts, DSB will continue to work with community rehabilitation programs, and other organizations to leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

(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)):

The methods to be used to expand and improve services to individuals with disabilities.

Priority: Competitive integrated employment

Goal: Increase competitive integrated employment opportunities and outcomes for individuals with visual disabilities, particularly those with most significant disabilities, underserved populations, and individuals with additional barriers to employment.

Strategies:

- Increase the use of work experiences, internships, apprenticeships and on-the-job training opportunities for consumers
- Assist consumers in exploring and developing opportunities for self-employment
- Increase the provision of soft-skills, independent living and assistive technology training for consumers
- Provide work incentives counseling for consumers who are seeking employment and receive Social Security benefits
- Continue to research and provide customized employment best practices and training for staff

- Provide training and resources for VR staff to enable them to develop better understanding and utilization of labor market information and tools to help consumers make informed decisions regarding vocational goals

Goal: Increase opportunities for training and employment services for adults with visual disabilities, particularly those with most significant disabilities, and underserved populations.

Strategies:

- Increase sponsorship of vocational and academic training for adult consumers, particularly those who are minorities and underserved populations with most significant disabilities
- Expand assistive technology training resources for consumers

Priority: Youth and students with disabilities

Goal: Increase opportunities for training and employment services for youth with visual disabilities.

Strategies:

- Increase the provision of soft-skills, independent living and assistive technology training for consumers
- Research, identify and implement training and employment services models that have proven to be highly effective in helping youth with visual disabilities achieve positive vocational outcomes
- Increase the use of work experiences, internships, apprenticeships and on-the-job training opportunities

Goal: Increase the provision of pre-employment transition services for students with visual disabilities.

Strategies:

- Enhanced targeted outreach efforts to identify individuals who can benefit from pre-employment transition services
- Fill vacant pre-employment transition services associate positions to help identify potentially eligible students and increase the provision of pre-employment transition services
- Evaluate current pre-employment transition services delivery model to identify areas of improvement needed
- If warranted after the review, redesign and implement a pre-employment transition services delivery model that will better meet the needs of students with disabilities
- Continue to build relationships and partner with educational officials and educators to ensure mutual understanding of the opportunities WIOA provides for students with disabilities and the roles each partner plays in the provision of services
- Continue to collaborate with the school districts to maintain existing Third-Party Cooperative Agreements and seek opportunities to expand them across the state

Priority: Business engagement

Goal: Build stronger relationships and partnerships with businesses and government agencies to develop or expand work experiences, internships, and employment opportunities for adults and youth who are blind, visually impaired or deafblind.

Strategies:

- Develop branded outreach materials to market services to employers
- Increase staff participation in local chambers of commerce and business leadership networks to help build stronger relationships with business partners

- Increase the provision of business services for employers including disability-related in-service training, assistance with recruitment/pipeline development, assistance in identifying and providing services to retain employees with disabilities, assistive technology and information regarding financial incentives for hiring individuals who have disabilities
- Provide training for staff regarding evidence-based best practices pertaining to business engagement.

Priority: Capacity building

Goal: Increase internal capacity and develop the program infrastructure needed to improve service delivery for VR participants and employers.

Strategies:

- Research innovative and effective VR service delivery models.
- Reorganize the VR program staff structure as needed to improve service delivery for consumers and employers.
- Identify other division staff and resources that can be better utilized to support this effort.
- Provide staff training, equipment, materials and resources to facilitate more efficient and effective higher quality VR services.
- Collaborate with DPI, ECU and ECAC to provide staff training regarding deafblindness
- Collaborate with DPI, ECU and ECAC to provide staff training regarding Person-Centered Planning.

Goal: Increase collaboration with core WIOA and required program partners and community stakeholders to integrate and expand services for individuals with visual disabilities.

Strategies:

- Continue outreach efforts to inform and educate the partners and stakeholders about DSB and the needs of individuals who are blind, visually impaired or deafblind.
- Continue to promote DSB's presence in NCWorks Career Centers through regular visits and periodic meetings.
- Seek opportunities for division director and agency participation on the local workforce boards.
- Continue to work with WINTAC to complete integrated resource team/community academy training and implement this service delivery model that builds wrap-around services, including those provided by these partners, to meet the holistic and individualized needs of consumers seeking employment.

Priority: Supported Employment

Goal: Increase outreach to identify individuals who are most significantly disabled and require supported employment services to achieve a successful competitive integrated employment outcome including outreach to consumers who reside in rural areas who may also be underserved.

Strategies:

- Conduct more targeted outreach activities.
- Build and nurture business relationships with businesses and organizations that provide services and supports for individuals who will require supported or customized employment services to achieve competitive integrated employment to facilitate more referrals for VR services.

Goal: Provide supported employment training for new counselors.

Strategies:

- Provide training regarding the classification of most significantly disabled, impediments to employment, policies, procedures, and best practices pertaining to supported and customized employment, and available resources, i.e. community rehabilitation program providers, etc.

Goal: Continue efforts to identify and expand the number of community rehabilitation program providers focusing on areas across that state that have limited resources.

Strategies:

- Partner with existing or newly created community rehabilitation program providers who may have historically not provided services for individuals who have visual impairments to encourage and support the expansion of their services for consumers.

- Provide sensitivity and awareness training for community rehabilitation program staff and supported employment service providers pertaining to working with individuals who are blind or have visual impairments including exposure to assistive technology and adaptive devices.

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.

Assessments of consumers' assistive technology needs and skills are conducted across the various stages in the rehabilitation process. Assistive technology is provided for individuals who require it to fully participate in training required in pursuit of their vocational goal and for employment. Assistive technology training is provided via individual and group instruction by agency staff and vendors. Individuals also benefit from the services and supports provided by the NC Assistive Technology Program which includes the use of loaner assistive technology and technology training.

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.

As indicated in the most recent comprehensive statewide needs assessment, DSB appears to be achieving its goal of reaching and serving individuals with disabilities who are minorities. All DSB direct services staff are responsible for conducting outreach activities and this requirement is included in their performance work plans. These activities are tracked and reported on a quarterly basis to the SRC. DSB will conduct more targeted outreach activities 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.

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).

Refer to (d) (1 and 2) Coordination with Education Officials and (o) State's strategies for youth and students with disabilities.

If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.

Rehabilitation professionals who were surveyed during the recent comprehensive statewide needs assessment identified some general needs with regard to establishing, developing, or improving CRPs in North Carolina that were not specific to services for individuals with visual impairments. The needs identified included staff training, addressing the limited number of CRPs in the state especially in rural

counties, and improving communication between providers and state agencies. Needs that were specific to individuals with visual impairments, included training for CRP staff on how to better serve the DSB population and the use of assistive technology. DSB will employ the following strategies to help address these needs.

- Partner with existing or newly created community rehabilitation program providers who may have historically not provided services for individuals who have visual impairments to encourage and support the expansion of their services for consumers

- Provide sensitivity and awareness training for community rehabilitation program staff and supported employment service providers pertaining to working with individuals who are blind or have visual impairments including exposure to assistive technology and adaptive devices.

  Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.

- Build stronger relationships and partnerships with businesses and government agencies to develop or expand work experiences, internships, and employment opportunities for adults and youth who are blind, visually impaired or deafblind by implementing strategies identified in section (o) State Strategies.

  Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.

DSB will continue to take advantage of the opportunities provided by WIOA to collaborate with partners within the statewide workforce development system. The following strategies will also be employed to strengthen the partnerships to assist individuals who have visual disabilities.

- Continue outreach efforts to inform and educate the partners and stakeholders about DSB and the needs of individuals who are blind, visually impaired or deafblind.
- Continue to support efforts to create and utilize methodology for receipt/exchange of electronic referrals, information and data.
- Promote equal, effective, and meaningful participation by individuals with disabilities receiving workforce development system services in all the NCWorks Career Centers in the state through the promotion of accessibility; the use of non-discriminatory policies and procedures; the provision of reasonable accommodations; auxiliary aids and services, and rehabilitation technology for persons with disabilities.

- Collaborate with partners to identify staff roles, responsibilities, and available resources, along with specification of the financial responsibility of each component of the statewide workforce development system with regards to paying for certain services (consistent with state law and federal requirements).

- Continue to promote DSB's presence in NCWorks Career Centers through regular visits and periodic meetings with identified partners of the workforce development system.

- Seek opportunities for division director and agency participation on the local workforce boards.
- Continue to work with WINTAC to complete integrated resource team/community academy training and implement this service delivery model that builds wrap-around services, including those provided by these partners, to meet the holistic and individualized needs of consumers seeking employment.

How the agency's strategies will be used to:

achieve goals and priorities by the state, consistent with the comprehensive needs assessment;

Refer to (o) State Strategies

support innovation and expansion activities; and

A perceived barrier for consumers who receive Social Security benefits and are interested in pursuing employment is the potential loss of these benefits. DSB recognized the need to obtain dedicated resources to provide work incentives counseling for consumers. This need was acknowledged and emphasized during DSB's participation in the RSA- funded technical assistance project "E3TC" Empower, Educate, Employ Targeted Communities. NC DSB and NC DVRS have jointly submitted an expansion budget request for work incentive counselor positions to serve consumers of both agencies and plan to utilize innovation and expansion funds to help accomplish this initiative during the period covered by this plan.

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.

- Continue to provide information in the preferred language and accessible format of individuals seeking services and participating in VR programs.
- Ensure program websites and electronic communications are accessible.
- Continue efforts to ensure agency offices, facilities and training provided and/or sponsored by the division are accessible to program participants.
- Promote equal, effective, and meaningful participation by individuals with disabilities receiving workforce development system services in all the NCWorks Career Centers in the state through the promotion of accessibility; the use of non-discriminatory policies and procedures; the provision of reasonable accommodations; auxiliary aids and services, and rehabilitation technology for persons with disabilities.

(p) **Evaluation and Reports of Progress: VR and Supported Employment Goals**

Describe:

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:

Identify the strategies that contributed to the achievement of the goals.
Describe the factors that impeded the achievement of the goals and priorities.

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:

Identify the strategies that contributed to the achievement of the goals.
Describe the factors that impeded the achievement of the goals and priorities.

The VR program's performance on the performance accountability indicators under section 116 of WIOA.

Priority 1: Increase the average wages and benefits of individuals closed with successful wage-earning employment outcomes

Goal 1.1. Individuals who are blind or visually impaired in North Carolina will have access to employment opportunities that provide good wages and level of benefits.

Progress Evaluation: In order to enhance job opportunities for consumers as well as to build relationships with employers, DSB's VR program focused on increasing the number of work experiences for clients on a statewide basis. This number has had a slow but steady increase each year and in PY 2018, consumers participated in 131 work experiences, in comparison to prior PY 2017 with a count of 125 work experiences completed. Internships for consumers exiting post-secondary programs has also been a stable. Although there were only a few completed statewide in PY 2018, efforts to provide this service to consumers are encouraged in counselor trainings. Community-based work adjustment services are also provided to consumers. The following reflect results in 2017- 2019 in terms of successful outcomes and active program participation for consumers: successful closures of SE cases: PY 2017 – 6, Year PY – 4. Consumers who are received community-based work adjustment services from PY 2017-2019 are as follows: PY 17(13), PY 18 (31), PY 19 (36). This was great progress since 2017 and continued growth is expected. As a result of these collective efforts, in PY 2018, the average wages for consumers increased to $13.83 per hour. With regard to employment outcomes with benefits, the percentage rate for PY 2018 increased by more than 100 percent (baseline 2018- 192). Of this number, 192 had benefits during employment with 58 having received benefits through their employer.

Goal 1.2. Increase staff knowledge about careers, employment opportunities, and business relationship development. Goal will be measured by staff reports to supervisors, who in turn will share with program specialist for job development.

Progress Evaluation: Training has been provided to the VR Counselors in their Annual VR Counselor Training as well as to new counselors in Best Practices Training, both provided as a mandatory learning initiative. These trainings are largely focused on assisting consumers to address and overcome barriers to employment and identifying career-based employment. Training to staff who primarily provide employment services; inclusive of job development and placement have completed additional learning opportunities focused on strategies for developing employment with employers in national industries which traditionally possess opportunities for career advancement, higher wages and substantial health and retirement benefit programs. Monthly conference calls were implemented by the rehabilitation program specialist for Employment Services with staff who provide employment services to clients for open discussions on local barriers, job development strategies and review/discussion of monthly employment reporting from these staff. The chief of rehabilitation field services also attended national training conferences, which were offered through two universities for the purpose of creating job driven strategies for transition-aged and adult consumers. One of these universities worked in alignment with the National Research and Training entity which had completed a comprehensive research project through Mississippi State University to review barriers and factors which impeded and supported increased employment outcomes. Strategic information learned within these platforms were brought back to counseling staff and thoroughly discussed in the annual VR Counselor Training. Successes in this goal area can also be measured by the high degree consumer satisfaction reported overall with the quality of services received as well as an increase in consumer wages overall, which emphasizes improved strategies in job placement.

Goal 1.3. Increase the use of supported employment services to facilitate successful employment outcomes for persons with the most significant disabilities. The goal will be measured by availability of vendors in areas where there are none at this time, increased authorizations for supported employment services, and increased number of individuals closed in successful employment after receiving supported employment services.

Progress Evaluation: Currently serving 77 individuals in SE, according to BEAM. Prior to PY 2017, we partnered with twelve providers of SE services. Six SE Providers were added during PY 2017 and four were added PY 2018 for a total of 22 CRPs providing services at the end of PY 2018. Prior to PY 2017 there were four contracts with CRPS for the provision of extended services. During the following two years, six new contracts with CRPS were added for the provision of SE extended services. The rehabilitation program specialist has recently located two additional CRPs in rural areas of the state (Pitt County areas) who are interested in providing SE services to our consumers. Training for these providers is planned in January 2020.

Goal 1.4. Provide a holistic approach to service provision that will better enable individuals to obtain employment and maintain it after DSB VR case closure. The goal will be measured by feedback from individuals closed with successful employment on the satisfaction survey, increase in success rate, and a decrease in the number of cases referred back to the agency within 36 months of successful employment outcome.

Progress Evaluation: Attendance to a holistic approach for consumers is a focus of the DSB VR Program. This area is attended through by recognition of secondary conditions and the impact that it has on the individual in addition to their primary visual condition(s). In order to engage counseling staff in the holistic approach, case reviews completed by the chief of RFS are completed annually with a follow-up on results to staff. Case plans are reviewed thoroughly and should address all areas of the consumer that are not stable or may pose a threat to the success of their rehabilitation program. Attention of counseling staff to this area has improved significantly over the past year as a result of this effort. Satisfaction surveys are completed randomly by contract services and the results reflect positive levels of consumer satisfaction overall with the DSB VR program; 90.6% felt that their needs (e.g., additional schooling, transportation, medical treatment, etc.) were identified properly which led to their becoming successfully employed. Ninety-two percent of survey respondents reported being satisfied with their overall experience with DSB.

Priority 2. Eligible individuals will have access to assistive technology required for employment

Goal 2.1. Provide assistive technology and training in its use for all eligible individuals who require specific equipment and software to obtain, maintain, and regain employment. Measurement criteria will be to increase the numbers of individuals who receive assistive technology services (equipment and/or training) by one percent (baseline 2013 – 429 individuals).

Progress Evaluation: Assistive technology is constantly evolving. Assistive technology staff meets yearly for in-service training to maintain expertise in providing AT services to blind, visually impaired, and deaf-blind consumers. In PY 2018, there were more than **620** DSB VR clients served by assistive technology field staff which is a substantial increase from prior year of approximately over a 30 percent increase.

Goal 2.2. Assistive technology staff in all seven district offices will receive training on latest software and hardware to enhance placement opportunities. Each field staff member will attend at least two training sessions (either on-line or in classroom) during the year on new technology. Because of the ever-changing types and updates to the area of assistive technology, there presents a constant need for training and research on need awareness.

Progress Evaluation: Assistive technology staff meets yearly for in-service training to maintain expertise in providing AT services to blind, visually impaired, and deafblind consumers. This year, training was provided on the impact of refractive errors, Echo Dot, NVDA, Windows 10 Narrator, impact of Pre-Employment Transition Services on AT services, new low vision devices, JAWS refresher, and Zoom Text Fusion highlights. There are other opportunities for AT training randomly provided to AT staff upon

registration on various training platforms; to include, state-leveled LMS system and through private vendors; i.e., American Federation for the Blind (AFB).

Priority 3. Transition services will be available in all counties of North Carolina for students who are blind or visually impaired.

Goal 3.1. DSB will continue to provide transition services to students who are blind or visually impaired attending schools in all 115 local education agencies (LEA's) of North Carolina. The goal will be to increase the number of individuals, ages 14-21, served by two percent (baseline for FFY2013 – 310).

Progress Evaluation: During PY 2018, 296 students between the ages of 14-21 were served by DSBs transition program. Although there was a slight decrease in the numbers served, this number does not include the number of students that received pre-employment transition services who were "potentially eligible" for services and may later apply for the transition program. Also, consideration should be given to the increase in programmatic transition services through contracts for providing pre-employment transition services and through over private vendors for summer programs.

Goal 3.2. DSB will provide continuing education training for transition program staff.

Progress Evaluation: Training to VR transition staff is a large focus of DSB as well. Annual VR counselor training as well as to new counselors in BEST PRACTICES are provided to transition counselors along with individualized training and job shadowing to new transition staff by the rehabilitation program specialist for transition and seasoned community employment specialist, with guidance from the Division's Chief of Rehabilitation Field Services.

Goal 3.3. Rehabilitation Counselors will increase their awareness of opportunities for internships and work experiences for transition age students.

Progress Evaluation: These trainings are largely focused on assisting transition consumers to address and overcome barriers to employment and identifying career-based employment. The annual trainings are provided by the chief of rehabilitation field services to all DSB VR Counselors. In addition to DSB internal trainings, transition staff have opportunities that are regularly taken advantage of for participation in trainings and conferences offered by the NC Department of Public Instruction at various locations around the state. Transition and VR counselors also attend employment-focused trainings in which they learn about internships, work experiences and the possibility of exploring apprenticeships, often available through partnerships with NCWorks.

Priority 4. Quality and knowledgeable outreach to individuals with disabilities, family members, and individuals who are minorities, including those with the most significant disabilities will be provided by DSB.

Goal 4.1. DSB's services will be provided to individuals, families, minority populations and those experiencing health disparities through targeted outreach activities. Data for the objectives will be captured and managed in DSB's new case management system called BEAM.

Progress Evaluation: At this time, DSB does not have the capacity to enter outreach data into BEAM due to limitations in developing the system. The agency is preparing to move transition to a new, more developed case management system which will likely include outreach data. In PY 2018, 267 outreaches were completed. Of these events, 245 minorities were in attendance.

Goal 4.2. DSB will develop marketing opportunities to targeted audiences regarding specific agency programs.

Progress Evaluation: DSB has identified and assigned staff to focus on outreach activities on a statewide basis. This is with the goal of focusing on specific underserved populations who may have unique needs based on their location and availability of resources. The division's outreach specialists identify targeted outreach opportunities in the community as well as creating opportunities for DSB initiated community events, i.e., job fairs.

Goal 4.3. DSB will identify ways by which DSB can assist veterans with disabilities to become able to obtain, maintain or regain employment. DSB will meet with officials working with veterans who are visually impaired, blind or deaf blind to educate them regarding services that are available to veterans with disabilities through DSB.

Progress Evaluation: DSB has identified and assigned staff to focus on outreach activities with emphasis on veterans with disabilities. Information on services to veterans is distributed to staff weekly. Much of the information shared with staff who work with the veteran population is focused on resources, ticket to work for those who receive disability benefits and local training events as well as learning opportunities available via webcasts. The staff identified to work with outreach to this population is also the agencies' program specialist for assistive technology and the deafblind population. This is an advantageous alignment of staff to provide services to meet the needs of the veteran population. DSB has also participated in and has begun conducting job fairs on a statewide basis. Although there is much work to be done in this area for widespread outreach, there has been some great participation from employers and consumers in these events. Some collaboration is done with local NCWorks Career Centers and other agencies that provide disability-related employment services.

Goal 4.4. DSB will continually seek and identify ways in which to reach the growing minority populations across North Carolina.

Progress Evaluation: These efforts are exercised through the many ongoing outreach events that DSB staff participate in throughout the state. Rehabilitation staff have a regular presence at many of the NCWorks Career Centers, schools throughout the state, and reach out to programs designed to work with individuals with disabilities who may otherwise not be aware of the DSB programs. Regular contacts are also made with physicians throughout the state to educate them about agency services and solicit referrals.

Priority 5. Over the next two fiscal years, implementation of systematic program evaluations and consistent quality assurance methods will ensure the agency is meeting the mission of enabling individuals who are blind or visually impaired to achieve their goals of independence and employment.

Progress Evaluation: DSB area supervisors and the chief of rehabilitation program field services complete quality assurance reviews for counselors. Feedback is provided with corrections to necessary areas. Counselors are required to submit monthly reports to their supervisors to reflect the monthly number of consumers being served and other relevant information. Other evaluations are completed monthly related to service provision per office and area of the state along with the costs expended per service for consumers. Continuous ways to measure program effectiveness is continuously being evaluated and research by agency administrators.

Goal 5.1. To provide consistent and accurate data using the new case management system, BEAM, to assess program performance. Measurable criteria are the program will be in place and staff will have received training by the end of FFY2015.

Progress Evaluation: Monitoring of case for compliance is reviewed bi-monthly from the area and district supervisors along with the chief of rehabilitation field services, who receives reports per area in this regard. Training to staff for BEAM functioning with regard to staff performance is offered in yearly VR Counselor training. BEAM training is also offered intermittently as the need arises by the system administrator for DSB. To date, all VR staff have completed training on how to complete activities within the system required for their job duties.

Goal 5.2. To provide holistic, consistent, and accurate methods of quality assurance and program evaluation. Measurable criteria will be that as the program goes "live", the rehabilitation program team and supervisors will evaluate the data as it becomes available and will identify specific methods of quality assurance that can be done through use of BEAM.

Progress Evaluation: BEAM has provided a platform for extensive data to be collected and WIOA-based data is reported quarterly. This data gives a comprehensive look at the services being received by consumers and the associated costs. Through these means, it is easier to view the level and degree of services received per consumer and collectively for consumers across the board. This allows administration to better plan for changes needed in areas of need as well as identify areas that have grown. DSB has regular leadership meetings which are often used to discuss program performance and problematic areas. This provides a collective and open forum amongst leaders of the division to brainstorm on programmatic adjustments that may be beneficial.

How the funds reserved for innovation and expansion (I&E) activities were utilized.

(q) **Quality, Scope, and Extent of Supported Employment Services**

Include the following:

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 timing of transition to extended services.

DSB purchases supported employment services from CRPs and offers supported employment services to eligible individuals with the most significant disabilities statewide including high school students participating in the DSB's transition programs. The funding for this program is from Title I funds and extended services are provided through separate funding. DSB has recently contracted with more supported employment services providers which allows eligible individuals to have more choices available to them for supported employment services to assist them in reaching their employment goals.

Supported employment services rendered by providers include: situational assessments and employment plan development; job development and job placement services; job coaching and supports to help consumers learn and stabilize on the job. Transition occurs when individuals work successfully without the provision of substantial services for at least 90 days.

Extended follow-along services must be immediately available to preclude any interruption in the provision of the ongoing support needed to maintain employment. The expanded scope of supported employment long-term supports requires a continuation of DSB's involvement to assist with the coordination and collaboration with the CRPs, employers, families and natural supports. Post-employment services are provided when supports and services needed by the individual exceed the responsibility of the extended long-term support services provider.

X. PROGRAM SPECIFIC REQUIREMENTS: VOCATIONAL REHABILITATION – GENERAL PROGRAM

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan 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:

(a) **Input of the State Rehabilitation Council (SRC)**

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

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;

For the DVRS Vocational Rehabilitation program, SRC members provided input through various venues as follows:

- The Council's Executive Committee addresses State Plan development, implementation, and progress towards both Plan goals and SRC goals within the Goals, Priorities and Strategies section of the State Plan during meetings with the Division's director and staff. During the quarterly meetings, the full council also provides input for the VR portion of the Unified Plan (formerly the State Plan) and the comprehensive statewide needs assessment planning processes.

- The SRC Consumer Input and Public Outreach Committee monitor and jointly conduct with DVRS the VR client satisfaction survey. The Consumer Input and Public Outreach Committee also plans and conducts two town-hall style public forums per year. The location rotates to ensure statewide coverage and stakeholder inclusion. The SRC has facilitated Spring and Fall listening forums in various locations across the state. In recent years, listening forums have been held as follows: April 2018- Dallas, NC; December 2018 Goldsboro, NC; April 2019 Cherokee, NC, and September 2019 Lumberton, NC. Stakeholder input from these and prior-year sessions are incorporated within and influence the Council's recommendations.

The SRC's Policy and Rules Committee reviews and provides feedback on policy drafts regarding client services and other agency policies, including agency policies required for compliance with the Workforce Innovation and Opportunity Act. Since the last plan update in 2018, the following policy revisions have received input from this committee:

- Pre-Employment Transition Services
- Residential Modifications
- Prior Approval Requirements
- Extended Services
- Louisburg Jr. College Support Services Policy
- Cash Management Policies
- Employment Engagement Survey
- Background Checks Policy
- Rehabilitation Counselor Proficiency Process
- Work Adjustment Training policy and transition plan
- Records sharing procedures with NC Disability Determination Services
- Prosthetics & Orthotics purchasing process streamlining

Other recommendations DVRS received from the NC State Rehabilitation Council:

In March 2017, the SRC developed an updated strategic plan (2017-19) comprised of five strategic goals and sub-strategies, which provide guidance when formulating SRC meetings and establishing committee priorities and shape the agency's approach to policy development implementation. The five goals are to:

Sustain service capacity of the NC Division of Vocational Rehabilitation Services

1) Ensure individualized services planning is client driven
2) Improve marketing, communication and outreach
3) Improve the efficiency of the vocational rehabilitation process
4) Improve or create transportation options for vocational rehabilitation consumers

Their strategic plan will subsequently be updated for 2020-2023 at the upcoming quarterly meetings.

Recommendation 1: In support of their strategic plan pertaining to improved marketing, communication, outreach and legislative advocacy to ensure service capacity is sustained, the Council recommended again for the Division to prepare for their distribution, customized reports for each NC legislative district featuring the beneficial return on investment that the VR program has on consumers and on the economy of each district within NC. The DVRS Planning and Evaluation unit will continue to support this request, revising the customized reports based on input and also added success stories to provide a human element to the data presented. The reports will be prepared and distributed to NC Legislators during the short session.

Recommendation 2: The Council recommends to improve the efficiency of the vocational rehabilitation process through the exploration of ways to expedite the provision of consumer services, including client purchases; conduct reviews of processes for increased efficiencies; explore ways to involve staff in identifying and addressing inefficiencies, and, in general, increase capacity to serve consumers who use English as a second language. DVRS supports all components of this recommendation and are currently addressing them.

Recommendation 3: The Council recommended for the quarterly full council meetings to contain a standing item for the Client Assistance Program to give an activity update. Further, the council recommended for a standardized set of questions and topic areas to be provided as a standard guideline to be used for regional director and/or a regional unit manager reports during quarterly meetings to allow managers to provide updates for local activities, developments and to express any concerns to the Council. DVRS has incorporated the recommended changes and will continue with these standing topics until the Council recommends further adjustments.

Recommendation 4: The Council recommended to continue to jointly conduct consumer input sessions to be held twice annually collecting input from various communities across the state and to strongly encourage staff attendance at such sessions whenever possible. DVRS will continue to actively support jointly conducted input sessions twice annually canvassing various communities across the state focusing on how the VR program is addressing consumers' VR needs through its service provision.

Recommendation 5: Whereas the Council is concerned about providing responsive services to consumers and realizes the Division's abilities in this area are impeded when high vacancy rates occur within the Division, the Council recommends that DVRS provide regular updates regarding key vacancies, including direct service positions such as counseling positions, so that the Council may advocate appropriately as included within the Council's current strategic plan. DVRS supports this recommendation and will continue to work with Council members to regularly provide updates through statewide and regional vacancy reports.

Recommendation 6: Whereas the SRC Consumer Input and Public Outreach Committee acknowledged decreasing response rates on client satisfaction self-administered written questionnaires, the Council recommends that DVRS continue the use of the telephonic client satisfaction survey. Further, the Council recommends continuing the practice of surveying clients in active status and to continue employing a

weighted sampling method to maintain costs and ensure representation across disability types, minority status, age, and gender.

Recommendation 7: Whereas the Council acknowledges the importance that reliable transportation solutions serve in assisting consumers in preparing for, obtaining, and maintaining employment, the Council recommends the Division to actively explore partnerships focusing on creative transportation solutions that will better meet the needs of all individuals with disabilities within the state. The Division also acknowledges the significance of this need and supports this recommendation. The Division director serves on a council with NC Division of Transportation that is working to address these needs at the systems level; while other means of individualized solutions are also being explored.

The Designated State unit's response to the Council's input and recommendations;

Recommendation 1: (annual report on return on investment by legislative district) The DVRS Planning and Evaluation unit will continue to support this request, revising the customized reports based on input and also added success stories to provide a human element to the data presented. The reports will continue to be prepared and distributed to NC Legislators during the short session.

Recommendation 2: (improving efficiency of the vocational rehabilitation process) The DVRS supports all components of this recommendation and are currently addressing them. The procedures for purchasing prosthetics and orthotics has been improved and ongoing work is being done to simplify the self-employment evaluation process to a feasible extent.

Recommendation 3: (regular reports from the Client Assistance Program at SRC meetings) DVRS has incorporated the recommended changes and will continue with these standing topics until the Council recommends further adjustments.

Recommendation 4: (jointly conducted public input sessions) DVRS will continue to actively support jointly conducted input sessions twice annually canvassing various communities across the state focusing on how the VR program is addressing consumers' VR needs through its service provision.

Recommendation 5: (regular reports on direct service position vacancies) DVRS supports this recommendation and will continue to work with Council members to regularly provide updates through statewide and regional vacancy reports.

Recommendation 6: (telephonic client satisfaction surveys) The Division supports this recommendation and will continue its adjusted sampling practices, contracts, and purchase orders accordingly.

Recommendation 7: (actively explore partnerships focusing on creative transportation solutions) The Division acknowledges the significance of this need and supports this recommendation. The Senior director serves on a planning council NC Moves with NC Division of Transportation that is working to address these needs at the systems level, while other means of *individualized* transportation solutions are also being explored.

The Designated State Unit's explanations for rejecting any of the Council's input or recommendations

The DVRS Vocational Rehabilitation program did not reject any of the Council's input or 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:

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;

the designated State unit will approve each proposed service before it is put into effect; and

requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

The DVRS Vocational Rehabilitation program is not requesting a waiver of statewideness for the period covering this plan, so this section does not apply.

(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;

(2) State programs carried out under section 4 of the Assistive Technology Act of 1998;

(3) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;

(4) Non-educational agencies serving out-of-school youth; and

(5) State use contracting programs.

(1) Federal, State, and local agencies and programs

DVRS extensively collaborates with and utilizes the services of federal, state, and local entities to achieve its mission on behalf of NC citizens with disabilities. DVRS routinely pursues improving its overall effectiveness through working relationships, partnerships, contracts and formal or informal agreements with entities at all levels. DVRS maintains written cooperative agreements with various federal, state, and local agencies. These include but are not limited to the Social Security Administration; the United States Office of Federal Contract Compliance Programs; the DHHS Division of Health Benefits; Division of Services for Deaf and Hard of Hearing; Office of Long-Term Services and Supports; Division of Disability Determination; Division of Social Services; Division of Mental Health, Developmental Disabilities, and Substance Abuse; and numerous local school systems, hospitals, and physical medicine and rehabilitation centers. The Easter Seals / United Cerebral Palsy Society of North Carolina, the National Multiple Sclerosis Society, the Brain Injury Association of North Carolina; the Veterans Affairs Vocational Rehab and Employment; the American Heart Association, and the North Carolina Arthritis Foundation are examples of consumer and advocacy groups for individuals with disabilities with which the Division has maintained agreements to facilitate the maintenance of the highest feasible level of communication and coordination in the joint development and implementation of operational methods including, where applicable:

- Assisting consumers, their families, and advocates in accessing services from DVRS and from the other agencies and entities;
- Referral of individuals who have disabilities and especially those who have severe disabilities to DVRS for services;
- Referral by DVRS to other agencies or entities for the various supportive services and assistance available;

- Determination of the responsibility of each agency or entity in making referrals, in serving individuals jointly, and in identifying resources;
- Provision of educational information regarding the services, including equipment and assistive technology, available and eligibility criteria of the Division and of the other agency or entity;
- Joint training of staff in areas pertaining to services available and procedures of DVRS and the other agency or entity;
- Shared funding DVRS positions and program costs and the colocation of DVRS staff with staff from the other agency or entity where co-location would be effective and feasible;
- Developing means to promote greater awareness and greater utilization of the provisions of the Americans with Disabilities Act;
- Provision for the sharing of information between agencies as required by law or upon receipt of client permission and with regard to maintaining confidentiality;
- Establishing an evaluation system to determine levels of competency of paraprofessionals such as interpreters for the deaf who wish to serve as vendors for DVRS;
- Enhancing post-secondary training supports to assist in the transition to employment;
- Improving the public image of the employment capabilities of individuals in various disability groups;
- Assessing the effectiveness of the cooperative agreements;
- Jointly promoting improvement in the quality of life through comprehensive approaches to the improved health of consumers jointly served and through services to family members;
- Jointly promoting ethical research practices to develop improved medical and other disability related interventions;
- Promoting systems change through collaborative projects;
- Expanding services and community resources for unserved and underserved groups;
- Promotion of collaboration at the community office level offices between the Division and other agencies and entities;
- Through joint planning councils, providing joint input from the Division and from other agencies and entities for budgeting, service delivery, and policy changes for block grants, special demonstration projects, and other grants;
- Providing input regarding formulation of vocational services provided by other agencies and entities.

Additionally, DVRS local Vocational Rehabilitation, Independent Living Program and NC Assistive Technology Program staff work with the Centers for Independent Living (CILs) in North Carolina to coordinate services for specific individuals and to address areas of broader systemic impact such as community education/awareness and outreach to various disability groups. The CILs are consumer-controlled, cross-disability, community-based nonresidential, private non-profit organizations that provide programs and services for people with all types of disabilities and their families. The goal of CILs is to promote and support opportunities for people with disabilities to fully participate in an integrated community and search for the possibilities to live as they choose. These centers are funded through Title VII of the Rehabilitation Act of 1973, as amended. Information and referral, independent living skills training, advocacy, and peer counseling are the four core services each center provides. In addition to these core services, the centers may provide additional services which are tailored to serve individuals with disabilities in their service area.

The Statewide Independent Living Council (SILC) is an independent nonprofit council (not an entity within a state agency) that is established under Section 705 of the Rehabilitation Act of 1973 as amended. The majority of its members are individuals with disabilities. The SILC is responsible for jointly developing and endorsing the State Plan for Independent Living in conjunction with the designated state unit (DVRS and DSB). The duties of the SILC are to monitor, review, and evaluate the implementation of the State Plan for

Independent Living. Further, the SILC is mandated to coordinate activities with the State Rehabilitation Council and other councils that address the needs of specific disability populations.

DVRS is also actively collaborating with the USDA-funded statewide AgrAbility program whose mission is to educate and assist NC farmers, ranchers, farmworkers and their family members who have disabilities to enable them to remain actively engaged in production agriculture. The collaborative involves NC Agricultural and Technical State University, NC State University Bio and Agricultural Engineering Department, East Carolina University Agromedicine Institute, and NC Cooperative Extension. Further, DVRS consumers benefit through the expertise and access to USDA programs, program funding and loans available through the NC Rural Center, which is represented through the Division's Small Business Advisory Committee (SBAC).

(2) State programs carried out under section 4 of the Assistive Technology Act of 1998

Assistive Technology services and devices are provided to eligible individuals statewide who require them. Rehabilitation technology and assistive technology services are sponsored and provided to the degree necessary to complete the rehabilitation program. Included are services and devices which can supplement and enhance an individual's functions such as adapted computer access, augmentative communication, specialized seating and mobility, vehicle modifications, and services which can have an impact on the environment, such as accessibility, job re-design, work site modification and residence modification. Application of the available engineering and assistive technology services and technologies is important when making determinations of eligibility particularly for individuals with significant and most significant disabilities. Rehabilitation engineering evaluations and services are not subject to an individual's financial eligibility; however, devices, equipment and modifications recommended by the engineer are subject to financial eligibility. Applicants during the assessment phase, and consumers determined to be eligible for services in need of and who can benefit from rehabilitation engineering services, devices and assistive technology services can be referred to providers of these services, and these services can assist to assist with assessment processes. Presently within the state, these services are made available statewide by Rehabilitation Engineers, Assistive Technology Consultants, and other agency staff as well as through outside Assistive Technology Suppliers and Providers.

The Division is fortunate to have the North Carolina Assistive Technology Program as a vital program component. The program increases access and the provision of services to individuals served within the VR program and supports the Division mission of increasing independence for clients in the home, post-secondary school and work setting. In addition, this affords clients of the Division with fast access to the programs array of services which includes: technical expertise in selecting the most appropriate device; hands-on demonstration and try-out of low tech and high tech devices for people with disabilities; information on a variety of technology options; funding resource information and strategies; short-term loan of equipment to consumers, families and professionals who serve them; training to consumers, families and professionals; technical assistance to local organizations, schools, and programs to expand assistive technology local service delivery capacity; awareness and outreach activities to inform the public about equipment and devices people with disabilities can use for greater independence.

DVRS collaborated with the North Carolina Assistive Technology Program (NCATP) to purchase iPads to train DVRS and community rehabilitation program (CRP) field staff in the use of technology to overcome specific barriers to employment. Staff learned different software applications (apps) as well as different ways to communicate to employers during job development. NCATP provides a professional development program available to all VR staff who provide evaluation, assistive technology equipment and assistive technology services for the consumers they are serving. NCATP has nineteen staff serving the state of North Carolina, which includes the Director, AT Information/ Referral /Funding Specialist, Intake Coordinator, Inventory Specialist, 1 AT Re-use Special Projects Assistant, 4 Speech Language Pathologists (SLP) and 8

Assistive Technology Consultants. The 8 AT Consultants and 4 SLPs provide direct one-on-one services in the Assistive Technology Centers.

Since 2015 DVRS has progressively increased their collaborative efforts with NCATP and other AgrAbility partners to provide assistive technologies and related services to farmers and farmworkers within the state. There have also been joint outreach efforts to Veterans with disabilities who may be interested in pursuing agriculturally-oriented occupations.

Additionally, the current interagency agreement between DVRS and education agencies, including the DPI and Local Educational Agencies (LEA)/School Boards, stipulate the financial responsibilities of education agencies, which include the provision of assistive technology required and included in an individual's IEP, without cost to the DVRS. Both DVRS and DSB share information about provides technical assistance and consultation to DPI, LEAs, and schools regarding accommodations and assistive technology that will help facilitate the education and vocational rehabilitation of students with disabilities, including students who are deaf or hearing impaired, blind, deaf-blind, or visually impaired.

(3) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture

DVRS is collaborating with the USDA-funded statewide AgrAbility program whose mission is to educate and assist NC farmers, ranchers, farmworkers and their family members who have disabilities to enable them to remain actively engaged in production agriculture. The collaborative involves NC Agricultural and Technical State University, NC State University Bio and Agricultural Engineering Department, East Carolina University

Agromedicine Institute, NC Cooperative Extension, and the NC network of Centers for Independent Living. Additionally, DVRS consumers benefit through the expertise and access to USDA programs, program funding and loans available through the NC Rural Center, which is represented through the Division's Small Business Advisory Committee (SBAC).

(4) Non-educational agencies serving out-of-school youth

DVRS VR staff work with the Centers for Independent Living (CILs) to coordinate services for specific individuals and also to address areas of broader systemic impact such as community education, disability awareness, and outreach services to various disability groups, including out of-school youth. The CILs are consumer-controlled, cross-disability, community-based non-residential, private non-profit organizations that provide programs and services for people with all types of disabilities and their families. The goal of CILs is to promote and support opportunities for people with disabilities to fully participate in an integrated community and search for the possibilities to live as they choose. These centers are funded through Title VII of the Rehabilitation Act of 1973, as amended. Information and referral, independent living skills training, advocacy, and peer counseling are the four core services each center provides. In addition to these core services, the centers may provide additional services which are tailored to serve individuals with disabilities in their service area.

(5) State use contracting programs

At this time, DVRS does not directly engage in formally established state use contracting program, where commodities or service determined to be of use to state agencies are purchased from community-based rehabilitation programs employing and training individuals with significant disabilities. DVRS does sponsor activities through several community rehabilitation programs that provide training services to DVRS consumers through contracts with entities such as the NC Department of Transportation for maintenance of facilities and distribution of safety campaign materials. DVRS does promote training and employment practices that align with competitive integrated employment standards.

(d) **Coordination with Education Officials.**

(1) The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

(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;

(B) transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

(C) roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

(D) procedures for outreach to and identification of students with disabilities who need transition services.

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

In 2018, the DVRS Vocational Rehabilitation program renewed their state level memorandum of agreement with DPI. The revised agreement includes the updated requirements of the final federal regulations on Title IV of WIOA. The purpose of the agreement is to outline a collaborative partnership between the two agencies to provide state level approval and support for enhanced transition services to students with disabilities. The revised agreement with DPI also specifies the manner in which pre-employment transition services are coordinated and provided within NC schools as well as how students with disabilities, including those who are potentially eligible for VR services, will be identified and served in compliance with federal regulations. The DVRS and DSB Program Specialists for Transition Services compile annual reports for DPI, as requested according to our agreement, summarizing VR activity for the state fiscal year.

In addition to a state level memorandum of agreement , the DVRS and DSB local offices and local education agencies (LEA) customize a local Third-Party Cooperative Agreement (TPCA) to outline how the agencies will work together to ensure that VR services are administered to students with disabilities. The TPCA stipulates administrative funding to support VR staff, outlines procedures for information sharing, and requires a process for referring students with disabilities to VR in order for the Divisions to carry out the VR process program. DVRS TPCAs with 90 of the 115 city/county-wide LEAs in North Carolina contribute funding towards 190 positions including VR counselors, business relations representatives, vocational evaluators and additional VR support staff including such as casework assistants and casework technicians available to provide VR transition services to students with disabilities served by the local community education agency. In areas where a TPCA has not been established, the local manager has designated a VR counselor designs a process for to directly serve the students with disabilities in the local schools students and youth in the local area to access VR services. Since 2003the issuance of WIOA Title IV regulations, DVRS has worked to formalize and implement the new requirements under WIOA including pre-

employment transition services. Following a series of interim policy directives, DVRS released policies and procedures in March 2018 outlining three primary mechanisms for making pre-employment transition services available to students with disabilities in the state who need them: DVRS staff-provided, purchased via fee-for-service, and contracted projects. These mechanisms allow for flexibility and growth to meet the varied needs of students with disabilities across the state based on a diversity of staff capacity and local resources as well as the needs of local schools and school districts. implemented strategies for serve transition-aged youth. Under WIOA and as the Title IV regulations are finalized, DVRS will be enhancing programs and services to transition-aged youth with increased focus on students with disabilities and pre-employment transition services. New programs are intended to align the Division with federal requirements under the Workforce Innovation and Opportunity Act, namely pre-employment transition services, as well as provide improved transition services to students while they are in high school. DVRS expects that continues to target a flexible approach to making VR and pre-employment transition services available to students with disabilities for added value to citizens and NC public schools. will see a value-add for investing in the VR partnership.

Plans for Coordination with Education Officials

DVRS plans to maintain and strengthen its programmatic relationships with school transition services through its continued active participation by the Division's Transition Program Specialist on the State Capacity Building Team for Transition. This team, including DVRS, NC Department of Public Instruction (DPI), college/university, parent, student, and community and advocacy organization DPI leadership, DVRS, University Center for Development and Learning, Parent/Child Advocacy Agency, Career and Technical Education, and NC Community Colleges System representation was formed in recent years to develop statewide goals and provide better coordinated transition activities for students with disabilities to achieve better results with post-school outcomes, including obtaining employment or attending post-secondary education. Currently, NC's Capacity Building Plan is focused on two goals: (1) improving provision of services in inclusive settings, improving soft skill development, and improving self-determination and self-advocacy skills through interagency collaboration and (2) improving student and parent knowledge of and engagement in the transition planning process through the provision of resources, guidance documents, and tools improving student involvement in the individualized education program (IEP) process so that planning is more meaningful and associated with a student's post-school goals. In 2018, a sub-team of the State Transition Team was formed to focus on targeted impact that could be achieved by state agency membership. This Core Sub-Team is working to devise a Joint technical Assistance and Training Plan in order to continue work in providing state-level technical assistance and training on WIOA requirements as well as to promote training around alignment with Individuals with Disabilities Education Act (IDEA) and Perkins V programs. The TA and training mechanism will focus on common messaging to special educators, career technical education professionals, and VR staff across the state. The goals are to provide a variety of levels of training and assistance to meet local transition teams where they are and move them forward with compliance and innovation to achieve the very best post-school outcomes for students with disabilities around the state. The state is continuing to work on a Transition Toolkit for teachers and anticipates the development of toolkits for parents, students, and agencies that will be individualized at the local level.

DPI consultants are providing transition training to LEAs to promote student-led IEPs, and NC DVR plans to provide training to VR counselors and LEA representatives in the Spring of 2016 to focus on the role of the VR Counselor in the IEP process.

DVRS plans to continue collaboration with DPI leadership on technical assistance grants that focus on improving transition services and employment outcomes for transition-aged youth, including re-submission for the National Technical Assistance Center on Transition (NTACT) Intensive Technical Assistance grant.

Description of policies and procedures for coordination with education officials

DVRS policies associated with transition and pre-employment transition services were updated and enhanced in March 2018 and address the following services and procedures specific to students with disabilities: The DVRS VR program plans to continue to increase transition service offerings to students with disabilities through partnerships with NC public schools. Some areas of program development and service enhancement being considered by DVRS are:

- Summer internships for students/youth with disabilities
- Increased utilization of On-the-Job Training (OJT) with students and youth
- Utilizing *Transition Navigators* to identify and serve students with disabilities who are potentially eligible and/or to provide VR pre-employment transition services to groups
- Increasing Project Search sites
- Hosting Self-Advocacy summer summits, camps, or school-based workshops
- Enhancing vocational evaluation tools and allocating increased vocational evaluation staff to serve students with disabilities in exploring career options
- Increasing work-based experiences for students with disabilities who require on-the-job supports, such as job coaching, by partnering in innovative ways with community rehabilitation programs.

Additional DVRS policy revisions are underway to clarify procedures around supporting students towards achieving and to report on measurable skill gains and recognized credentials. These policies will also address coordinating training services with individualized education programs (IEPs) through joint planning and collaboration with education officials. Policy work will continue as well in serving students with learning disabilities as the NC Department of Public Instruction (NCDPI) implements a multi-tiered system of support (MTSS) in their identification of students with learning disabilities. plans to re-brand and revise marketing materials and communications about VR services to students with disabilities to highlight pre-employment transition services offerings to both students and school personnel. This effort will include targeted marketing for youth disability groups whose incidence within DVRS is declining despite remaining steady or increasing within the public schools (e.g., students with learning disabilities). DVRS will revisit policies related to post-secondary training and learning disability eligibility to ensure that the needs of all eligible students with disabilities as well as those students for whom the program is mandated to provide pre-employment transition services are being met in terms of preparing students to obtain competitive integrated employment in such a way to promote advancement and ongoing career development.

By enhancing and incorporating new programs that promote and support work-based experiences, the Division will continue its commitment to students in pursuit of a high school diploma through the Occupational Course of Study (OCS), a pathway established by the NC Board of Education for students with IEPs to achieve a high school diploma by completing occupational coursework and work experiences. DVRS has recently revised policies for In-School Work Adjustment services to students with significant or most significant disabilities. The service is coordinated through school-based agreements to incentivize a student's participation in school-coordinated work experiences by providing guidance and counseling as well as an incentive payment to students for improvements in work behaviors and attitudes. Since the last planning period, the Division continues to offer has increased internship and OJT services to participation by students by approximately 800% , but hopes to increase utilization and improve feasibility for students, schools, and partnering businesses through as a result of 2015 policy and procedure revisions and collaboration with workforce system partners. Through the provision of pre-employment transition services and other VR transition services, the Division aims to engage even more students in work-based learning to allow students to make better informed decisions about their career paths. Other pre-employment transition service programs under consideration are intended to address students' expectations around pursuing employment and to improve their preparedness for participating in additional rehabilitation services, such as training and placement.

DVRS continues to require each local VR office with a TPCA with schools to VR counseling staff serving on a local school transition services team to send an annual report to the school systems with which the Division has a TPCA summarize student participation in VR programs. This report includes data about services and expenditures for students with disabilities provided by the Division and addresses how VR staff members worked with school staff in transition planning for students with significant and most significant disabilities.

Individualized plans for employment for transitioning students

The Division's casework policies addressing the provision of transition services defines transition services as a coordinated set of activities for a student designed within an outcome-oriented process that promotes movement from school to post-school activities, including post- secondary education, vocational training, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation. Furthermore, DVRS policy states that the coordinated set of activities must be based upon the individual student's preferences and interests, and must include instruction, community experiences, the development of employment and other post-school adult living objectives and, if appropriate, acquisition of daily living skills and functional vocational evaluation. Finally, DVRS casework policies require that transition services must promote or facilitate the achievement of the employment outcome identified in the student's individualized plan for employment. In order to plan effectively for the transition needs of students with disabilities in collaboration with other agencies and organizations, DVRS rehabilitation counselors are expected to be active participants addressing the Individualized Education Plan (IEP) meeting transition issues when possible. Counselors are expected to participate both directly in IEP meetings and indirectly by other means in planning for the needs of VR consumers. A copy of the transition portion of the IEP is required to be maintained in the case record. Prior to developing the IPE, the VR counselor reviews the Individual Transition Plan (ITP) component for the Individual Education Plan and records any relevant ITP objectives as part of the IPE. The intent of this review is to coordinate educational programming and vocational programming for the benefit of the VR consumer. Additionally, the Division's policy stipulates that the development of the IPE with a student must be based on interests, aptitudes, capabilities, strengths, and informed choice. The job choice on the IPE for a student in transition may indicate a family of jobs rather than a specific job code, for example, Health Care Worker, Office Work, and Protective Services such as police, firefighter, or security guard. DVRS policy does require career exploration to be provided and documented in order to determine a more specific goal, and this process and expectation has been further emphasized by recent policy revisions concerning development of the IPE within 90 days of the VR eligibility determination. Amended job choices, including amendments at closure, must be accompanied by documentation reflecting the process and services that had an impact on the final job choice, including job shadowing, job sampling, and guidance and counseling. Moreover, DVRS casework policy stipulates that the development and approval of an individualized plan for employment must be completed as early as possible during the transition planning process but, at the latest, by the time each student determined to be eligible for VR services leaves the school setting. This includes students with disabilities who are eligible for VR services including eligible students served by the school under an IEP.

<u>Information on the formal interagency agreement with the State educational agency</u>

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;

(B) transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

(C) roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

(D) procedures for outreach to and identification of students with disabilities who need transition services.

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

In order to ensure effective facilitation of the transition of students with disabilities from school to the receipt of VR services, DHHS (the designated DSA) DVRS maintains both a joint formal agreement with the Exceptional Children and Career Technical Education Divisions of DPI and also maintains 90 separately held TPCAs with local education agencies (LEA's) or school programs. The agreement with DPI will be revised upon issuance of the final regulations for Title IV to account for new mandates concerning pre-employment transition services, serving the "potentially eligible," Section 511 impacts on contracted services between schools and programs operated under a subminimum wage certificate, and a number of other new requirements were revised in 2018 and includes the following components:

- Local cooperative agreements
- Consultation and technical assistance
- Transition planning
- Pre-employment transition services
- Roles and responsibilities
- Outreach and identification of students with disabilities
- Coordination responsibilities of each agency that promote the coordination, timely and appropriate delivery of transition services (IDEA)
- Criteria related to subminimum wage requirements in Section 511 of the Rehabilitation Act
- Procedures for resolving interagency disputes
- Data sharing

Additionally, in that the agreement is not only with the Exceptional Children's division of the SEA, but also the Career and Technical Education division, NC DVR hopes to leverage partnerships that create more opportunity for students with disabilities to advance along a career pathway and to participate in work-based experiences beginning in high school.

Within the current formal interagency agreement between DVRS DHHS and DPI, mutual interagency responsibilities include the consultation and technical assistance section requires that the Departments to:

- Make consultation and technical assistance available through in-person meetings or through other means, such as conference calls, webinars, or video conferences
- Provide educational and training opportunities, including joint training opportunities, to SEA and LEA staff to ensure understanding of pre-employment transition services and other transition services and the roles and responsibilities of SEA, LEA, and VR partners in the provision of these services
- Meet annually to address systems, policy, practice, and funding issues that facilitate or negatively impact the transition of students with disabilities from school to work or post-secondary education.
- Align policy and practices at the state and local level to facilitate the seamless transition of students with disabilities from school to work or post-secondary education
- Designate individuals to represent the agencies and act as liaisons to facilitate the joint efforts of the two agencies

- Provide consultation, when requested by local staff, on determining responsibility in instances where services required by a student may be both a special education or related service under IDEA and a VR service under WIOA

Considering the reauthorization of the federal Perkins Act, along with the relative newness of WIOA, the Division is working with the Career Technical Education and Exceptional Children Divisions of DPI to provide a mechanism for coordinated technical assistance and training that triages requests and categorizes the type of assistance needed, ranging from intensive/targeted to general/universal. With large groups of educators, educational administrators, career technical education professionals, and VR counselors and specialists, the Division hopes that this mechanism will help to prioritize and dispatch limited training and technical assistance resources to the wide audience of persons who need it.

At the local level, TPCAs between local VR units and the LEAs mirror the components of the state level MOU. Therefore, at the local level, Division staff are required to provide consultation, technical assistance, and administrative support to their assigned school system. They are also required to participate in joint planning with the LEA to assess the needs of students with disabilities and prioritize VR service-delivery strategies, including those for providing pre-employment transition services. Lastly, the local VR Unit and LEA are required to exchange policy information relevant to the coordination of services and participate in training made available by the opposite party when possible.

- Mutual participation of appropriate personnel in the development of the transition component of the Individualized Education Program and the Individualized Plan for Employment for students with disabilities.
- Designation of an individual from Vocational Rehabilitation Services, Exceptional Children and Career Technical Education Divisions to serve as liaison with each other to represent the services of the two agencies.
- Exchange of information deemed pertinent and of mutual concern regarding service delivery. • Interagency cooperation in transition planning for students with disabilities.
- A mutual system to be developed and maintained to ensure that appropriate referrals are made to each party.
- Consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to postschool activities, including VR services

A description of DVRS responsibilities pertaining to this area

Within the current formal interagency agreement, the DVRS has responsibility to ensure the provision of an appropriate program of VR services to each perspective VR client by:

Providing administrative, technical, and consultative services when needed through local, regional and state VR services' staff to local school administrative units serving students with disabilities in transition programs. DVRS' Program Specialist for Transition Services and the state Program Consultant for Intellectual Disabilities and Secondary Education with DPI, cooperatively provide programmatic information, training and support to local school systems and to VR transition staff to maintain and enhance the quality of transition services for successful post-school outcomes for students with disabilities. The DVRS specialist provides regular technical support to schools by participating in and presenting at transition training institutes regarding transition services and adult service agencies. The DVRS specialist also visits and provides consultation and training to local schools with transition teachers, coordinators, job coaches, and other professionals.

Screening students with disabilities referred to DVRS by the local school administrators to determine eligibility for VR services. Eligibility for VR services is based on the presence of a physical or mental impairment which for the individual constitutes a substantial impediment to employment. The student must require VR service to prepare for, secure, retain or regain employment. The determination of eligibility for VR services provided by DVRS is the sole responsibility of DVRS and is not delegated.

Administering all aspects of the DVRS VR program services including the determination of eligibility, diagnostic and evaluation services, rehabilitation planning, transition services and the provision of a program of VR services. Some services are subject to the student's financial eligibility and/or comparable benefits.

Providing vocational assessment trial work and adjustment services to students with disabilities who have an identified need and meet eligibility requirements.

Providing appropriate data to the Exceptional Children Division about the number of school age students served by DVRS, by disability, age, types of services provided and post-school employment outcome through annual reporting.

Promoting the development of cooperative agreements between DVRS and local school administrative units that include the following components: Roles of each agency; Financial responsibilities; VR staffing and supervision by the DVRS; Procedures for outreach, referral, liaison staff between the parties, eligibility, delivery of services, dispute resolutions, sharing of appropriate client information and student involvement; Joint staff development and training; Services to students with disabilities who are not receiving special education services; Assurances of compliance with Individuals with Disabilities Education Act (P.L. 105-17), Carl Perkins Vocational and Applied Technology Act (P.L. 105-332), the Rehabilitation Act of 1973 as amended; and, with the local educational agency (LEA), provide and implement an ongoing evaluation of the cooperative efforts with a formal annual review of the proposed budget and any necessary interagency agreement updates.

A description of Exceptional Children Division's responsibilities pertaining to this area

Through the formal interagency agreement in place, the Exceptional Children Division of the DPI has the following responsibilities with respect to the provision of technical assistance and consultation with local educational agencies:

- Provide technical assistance to local school administrative units to ensure access for students with disabilities in appropriate Career and Technical Education Programs based on recommendations of the Individualized Education Program (IEP) Team.
- Assist local school administrative units in the planning, development and implementation of transition services for students with disabilities.
- Inform local school administrative units of services available from DVRS and promote referral generation.
- Promote the provision of psychological, vocational, therapeutic (e.g., speech-language, occupational and/or physical therapy services), assistive technology, and work adjustment services and educational assessment in collaboration with local educational agencies (i.e., school districts) for students with disabilities having an identified need.
- Promote the development of cooperative agreements between Vocational Rehabilitation Services and local school administrative units in keeping with 34 C.F.R. Section 361.38 Protection, Use, and Release of Personal Information.

Career Technical Education Division's responsibilities pertaining to this area

Through the formal interagency agreement in place, the Career Technical Education Division of the NC DPI has the following responsibilities with respect to the provision of technical assistance and consultation with local educational agencies:

- Provide needed consultation to ensure the initiation of cooperative career/technical education and internship programs for students with disabilities involved in local school administrative units and other state agencies.

- Provide consultative services to local school administrative units and other state agencies and institutions to ensure initial placement and maintenance of eligible students with disabilities in Career and Technical Education Programs.
- Provide needed consultation to ensure the initiation of cooperative career/technical education and internship programs for students with disabilities involved in local school administrative units and other state agencies.
- Provide consultative services to local school administrative units and other state agencies and institutions to ensure initial placement and maintenance of eligible students with disabilities in Career and Technical Education Programs.
- Promote the provision of vocational/technical assessment services, career-decision making training, vocational instruction, and transition planning for students with disabilities in local school administrative units.
- Promote career/technical education counseling, cooperative work experience, internships and job placement of students with disabilities by local school administrative units.
- Assist local school administrative units in the planning, development, collection of data, and implementation of transition services for students with disabilities.

Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs

The current interagency agreement between DVRS and the state education agency stipulates that transition planning for students with disabilities will be a cooperative effort. Furthermore, the agreements specifically require mutual participation of appropriate personnel in the development of the transition component of the Individualized Education Program and the Individualized Plan for Employment for students with disabilities. The sharing of Individual Education Plans (IEPs) and Individualized Plans for Employment (IPEs) at the local level is strongly encouraged. DVRS VR counselors are required to review a student's transition component of the IEP and incorporate, as appropriate, a description of relevant objectives in the IPE. Furthermore, a comprehensive evaluation will be completed by the State agency on each eligible individual, to the degree necessary, to determine the vocational goal and scope of VR services to be included in the IPE. The agreements and DVRS policies state that the student with the disability is expected to fully participate in the development of the plan and any plan amendments. The agreements and VR policies also specify that the DVRS VR counselors will provide the individuals with information enough to make an informed choice among alternative goals, objectives, services, entities providing such services and methods to procure such services. Additionally, the agreement and VR policies require that the VR counselor is to review the IPE with the individual or his/her representative at least once each year.

Within the current formal interagency agreement between DHHS and DPI, transition planning requires that the Departments:

- Cooperate and work jointly in providing/promoting transition planning for students with disabilities
- Assist local education agencies (LEAs) in planning for/promoting the transition of students with disabilities in the development and completion of the IEP required under IDEA and the IPE required under WIOA
- Coordinate with/support the development of students' IEPs and IPEs through local third party agreements
- Communicate/encourage communication regarding students' IEP and IPE goals and needed transition services as soon as possible after the IEP and IPE are developed
- Foster innovation in transition program design and service delivery strategies between the local DVRS and DSB offices and the LEAs

- Support local involvement in the planning and activities of area workforce boards as well as partnerships with local employers to promote programs and services for students and youth with disabilities
- Provide consultation to assure access to and programming for students with disabilities in career and technical education, work-based learning, career assessment, career decision-making training, and career counseling as determined by the local transition planning teams.

At the local level, TPCAs between local VR units and the LEAs mirror the components of the state level MOU such that the local VR Unit and the LEA are required to engage in planning that promotes the development of the IPE and IEP and which prepares students for transition from school to post-school activities, including planning for pre-employment transition services. The parties shall also use existing data when appropriate or obtain supplementary assessments and for each eligible individual, the local DVRS unit shall complete a comprehensive assessment that consults the transition component of the student's IEP if an IEP exists.

Roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services

The NC Department of Public Instruction (NCDPI) is the State Education Agency with whom the DSA partners to promote and implement the VR program throughout NC public schools. As a locally controlled state, VR transition services are further coordinated with LEAs who opt in to such agreements. Where LEAs do not opt in to agreements, DVRS provides VR transition and pre-employment transition services according to the state level MOU using an itinerant staff structure as opposed to a designated staff structure so that VR transition and pre-employment transition services can still be made available to students with disabilities statewide. The current interagency agreement between DVRS and the state education agency includes two sections relevant to roles and responsibilities, including financial responsibilities:

- Roles and responsibilities
- Procedures for resolving interagency disputes including procedures for LEAs to initiate the process to receive reimbursement or regarding implementation of the Agreement

The Roles and Responsibilities section requires that:

- The Departments administer aspects of their respective programs. [Insomuch as public education services are locally controlled, this requires that DPI assist LEAs in the planning, development, and implementation of transition services to students with disabilities to become college, career, and community ready. DHHS as the DSA is required to administer all aspects of the State vocational rehabilitation program including the determination of eligibility, diagnostic and evaluation services, rehabilitation planning, transition services and the provision of a program of vocational rehabilitation services, some of which are subject to financial need or comparable benefits.]
- DHHS assumes responsibility, within the limitation of resources, for the cost of services included in the students IPE, according to the established DHHS policies and fee schedule
- DHHS reports annually the total amount of state-appropriated monies expended for rehabilitation services for students with disabilities. The reports should be made available annually to DPI within 60 days of the end of the state fiscal year.
- DPI provides access to annual report data on students serviced through the Career Technical Education and Exceptional Children Divisions.
- DPI supports the sharing of diagnostic information of students with disabilities for the purpose of accessing vocational rehabilitation services, including pre-employment transition services, so long as sharing is in compliance with the requirements of the Family Education Rights and Privacy Act and other legal requirements relating to student privacy rights.
- DPI supports practices for LEAs to secure psychological, vocational and educational assessments, according to state and local policies, for students suspected of needing assessments.

In addition to collaborative practices put in place by the state-level agreement, the local TPCAs between the local VR unit and LEA narrow down more specific responsibilities including requiring that:

- The parties assist in outreach and identification of students with disabilities who require VR services or pre-employment transition services,
- The parties develop a system for generating referrals to the VR program
- The LEA assists with securing and sharing diagnostic information required for students to access the VR process
- The local VR unit contacts the student at the earliest possible time to initiate a VR application and/or request pre-employment transition services.
- The local VR Unit, in collaboration with the LEA, provides or arranges for the provision of pre-employment transition services to students with disabilities who need them
- The LEA supports the Division in providing pre-employment transition services to students in their district.

The section of the state-level MOU between DHHS and DPI regarding Procedures for Resolving Interagency Disputes requires the following:

- That parties utilize best efforts to resolve any dispute that may arise in the provision of services outlined in the agreement and collaborate to achieve the best possible outcome for students with disabilities
- When there are real or perceived overlaps in the responsibilities for special education or other related services under IDEA and VR services under the Rehab Act, DHHS and DPI support and advise local staff in considering the following factors to determine the responsible party:
    - whether the service is customary to the party from whom the service is requested (if customary, the party shall provide);
    - the primary objective of the service/support (educational or vocational);
    - the impacts of delaying service provision;
    - agency-specific policies or limitations around the provision of the service (e.g., maximum purchase rates, selection of providers);
    - eligibility of student under Part B of IDEA;
    - length of time to exit from school in terms of ongoing need for and replacement frequency of service or equipment (e.g., if equipment is needed, will the lifespan of the equipment be contained to the student's time within the secondary educational setting or extend to the transition from school to post-school activities?); and/or
    - the need for transferability of skills and practice with service/equipment to be prepared for post-school IPE participation (e.g., will the student need time to practice using equipment or receiving a specific transition service to facilitate transition to post-school services/outcome as planned on the IPE without delay or interruption? If so, this may warrant VR funding of the equipment or service.)

The third-party cooperative agreements between local VR units and LEAs mirror the state level agreement in terms of resolving interagency disputes and include a requirement that the parties consult with state level designees from DVRS and DPI when a resolution cannot be achieved at the local level.

In terms of other financial responsibilities and qualified personnel for delivering transition services, the TPCAs require that:

- each participating LEA contribute an annually specified sum for rehabilitation services directly provided by Division staff and for the administration of those services, that expenditures are made under the approved agency State plan; and that the expenditures are made under the control and supervision of DVRS

- DVRS finances the program by use of State and Federal matching funds, as required under Title I of the Rehab Act and that financing the rehabilitation program occurs on an annual budget basis to insure continuity of operations; and that DVRS must provide State funds equal to the State's share of planned expenditures as specified in the Federal Act
- DVRS maintains accounts and supporting documents that permit an accurate determination at any time of the status and State and Federal participation of expenditures incurred in the operation of the rehabilitation program; and that the specific items of each annual budget are determined jointly and agreed to by the parties prior to the beginning of each fiscal year
- The contribution by the LEA to DVRS is made upon submission of an invoice by DVRS to the LEA for the state's share of the annually agreed upon budget and consist totally of non-Federal funds which have not or will not be used to match Federal funds other than Federal Vocational Rehabilitation funds used in this program
- DVRS provides Federal funding in the amount of 78.7 percent of the agreed-upon annual budget depending on the availability of Federal funds and the program arrangements
- DVRS provides, within the limitations of available resources, case service funds necessary to the delivery of vocational rehabilitation services
- DVRS assigns rehabilitation staff to serve each high school within the LEA who will maintain an active caseload at all assigned schools; and that rehabilitation staff visit the assigned school on a scheduled routine basis to receive referrals and transact other matters necessary to effectively administer the rehabilitation program; and that in the event of a staff vacancy or leave of absence, DVRS exercised best efforts to maintain the continued delivery of services to students
- The LEA identifies a staff person(s) to serve as liaison to rehabilitation staff assigned by the Division in carrying out the planning, coordination, and delivery of services as outlined in this agreement
- The LEA shall provide adequate meeting space in all assigned schools that is accessible to staff and individuals with disabilities, private for individual counseling, and environmentally comfortable, with conditions that are conducive to confidentiality and counseling; and that any and all equipment purchased under the Agreement remains property of the Division stipulates that transition planning for students with disabilities will be a cooperative effort. Furthermore, the agreements specifically require mutual participation of appropriate personnel in the development of the transition component of the Individualized Education Program and the Individualized Plan for Employment for students with disabilities. The sharing of Individual Education Plans (IEPs) and Individualized Plans for Employment (IPEs) at the local level is strongly encouraged. DVRS VR counselors are required to review a student's transition component of the IEP and incorporate, as appropriate, a description of relevant objectives in the IPE. Furthermore, a comprehensive evaluation will be completed by the State agency on each eligible individual, to the degree necessary, to determine the vocational goal and scope of VR services to be included in the IPE. The agreements state that the student with the disability is expected to fully participate in the development of the plan and any plan amendments. The agreements specify that the DVRS VR counselors will provide the individuals with information sufficient to make an informed choice among alternative goals, objectives, services, entities providing such services and methods to procure such services. Additionally, the agreement requires that the VR counselor is to review the IPE with the individual or his/her representative at least once each year.

(c) Roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services Summary of Roles and Responsibilities of DVRS under the current agreement:

- Provide a program of VR services to eligible individuals referred by the third party and to other individuals found eligible for services.
- Collaborative development of the transition component of the Individualized Education Program (IEP) and the Individualized Plan for Employment (IPE) for students with disabilities.
- Provide effective and appropriate supervision of the VR activities and VR staff assigned to provide the services.
- Provide administrative and consultative support, in the area of its program responsibilities, to the local education agency.
- Share statistical and fiscal reports to other parties as deemed mutually necessary to ensure open communication and good administrative practices.
- As part of the agreement, DVRS Rehabilitation Counselors will provide individuals with information sufficient to make an informed choice among alternative goals, objectives, services, entities providing such services and methods to procure such services. The counselor is to review the IPE with the individual or his/her representative at least once each year. The VR counselor will provide each eligible individual an IPE Handbook wherein there is an appeals process outlined. Information pertaining to the Client Assistance Program (CAP) is included in the handbook. The VR counselor agrees not to close an individual's record as having achieved a successful employment outcome until the person exits school and is determined that the individual has successfully completed the IPE.
- Conduct an annual survey of students in the school system.
- The VR counselor will place major emphasis on students who are juniors, seniors, or potential dropouts.
- Screen referrals from other sources within the school system to enable students with disabilities who do not have an Individual Educational Plan (IEP) to be considered for VR services.
- Mutually agree to utilize appropriate staff development personnel in the planning and implementation of joint inter-disciplinary team training and/or staff development for purposes of effectively providing transitional services to students with disabilities.
- Liaison personnel appropriate and qualified for the provision of transitional services, recommending needed changes and implementing the agreement will be appointed by the administrative units of the parties named in the agreement with the educational agencies.

Summary of financial responsibilities of each agency

The current interagency agreement between DVRS and Education Agencies including the NC Department of Public Instruction and Local Educational Agencies/School Boards stipulate the financial responsibilities of each party. Financial responsibilities of respective parties are described in more detail within the third-party cooperative agreements between DVRS and the LEA's, since this satisfactorily addresses the need. Summary of financial responsibilities of DVRS under the agreements:

- Provide Federal funding in the amount of 78.7% of the agreed-upon annual budget depending on the availability of Federal funds and the program arrangements.
- Maintain accounts and supporting documents that will permit an accurate determination at any time of the status of State and Federal participation of expenditures incurred in operation of the rehabilitation program.
- Assume responsibility, within the limitation of resources, for the cost of services included in the student's Individualized Plan for Employment (IPE) according to DVRS' established policies and fee schedule.
- Within the limitations of available resources, provide case service funds necessary to the delivery of VR services

- Accept financial responsibility for the cost of DVRS' portion of cooperative training efforts and maintain proper accounts and records of these activities. Summary of financial responsibilities of the Educational Agency partners under the agreements:
    - Parties entering into an agreement contribute to DVRS an annual cash amount of 21.3% of the agreed-upon annual budget. Whereas DVRS must provide funds equal to the State's share of planned expenditures as specified in the Federal Act. The local per centum match funds are to consist totally of non-Federal funds that have not or will not be used to match Federal funds other than Federal Vocational Rehabilitation funds used in this program.
    - Any contribution of funds is made available for expenditure at the sole discretion of the DVRS. It is understood that such funds must be spent for rehabilitation services and for the administration of those services; that expenditures must be made under the approved agency State plan; and that expenditures must be made under the control and supervision of the DVRS.
    - Provide all individuals determined eligible for VR services with those services that are its legal and traditional responsibility, e.g., assistive technology required and included in an individual's IEP, without cost to the DVRS. The cooperative program is utilized to provide services which represent new services or new patterns of services when compared to existing services.
    - Provide and maintain adequate facilities and office space that is accessible to both staff and individuals with disabilities, private for individual counseling, with conditions that are conducive to confidentiality and counseling.
    - Accept financial responsibility for the cost of their party's portion of cooperative training efforts and maintain proper accounts and records of these activities. .

Procedures for outreach to and identification of students with disabilities who need transition services

The procedures for outreach to and identification of students with disabilities who need transition services is addressed specifically through the state-level MOU between DHHS and DPI. The agreement requires that:

- DPI inform LEAs of services available from DHHS and promote referrals for students with disabilities who may or may not be receiving special education and are in need of pre-employment transition services and/or VR transition services, including the development of an IPE
- DHHS reviews the required documentation of students with disabilities who have been referred by the LEA to determine eligible for the vocational rehabilitation services; and that this eligibility determination remain the sole responsibility of the DHHS.

In addition to procedures put in place by the state-level agreement, the local TPCAs between the local VR unit and LEA specify the responsibilities related to outreach for the locally-controlled education party as well as VR:

- The parties assist in outreach and identification of students with disabilities who require VR services or pre-employment transition services,
- The parties develop a system for generating referrals to the VR program
- The LEA assists with securing and sharing diagnostic information required for students to access the VR process
- The local VR unit contacts the student at the earliest possible time to initiate a VR application and/or request pre-employment transition services.

DVRS policies ensures that students with disabilities who are not receiving special education services have access to and can receive VR services, if appropriate, by ensuring outreach to and identification of these students. Outreach to these students occurs as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the VR program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals. DVRS VR counselors are required to contact persons in the schools responsible for coordinating services to students

under the Individuals with Disabilities Education Act (IDEA) and 504 plans and are instructed to conduct high school surveys in order to identify eligible students with disabilities. The Program Specialist for Transition Services has put forth effort at the state level to formulate relationships with pertinent staff with DPI to ensure strong working knowledge of DVRS and to encourage staff development programs to include a VR component. The importance of completing outreach to students through non-traditional means to identify students is emphasized in the Division's casework policy. Furthermore, to generate appropriate referrals, DVRS counseling staff members are encouraged to contact other resource personnel within the local schools including social workers, school nurses; occupational, physical and speech therapists. One of the primary goals of the Division's provision of transition services is to work with youth with disabilities who are at risk of dropping out of school. Factors to consider for "potential dropout" referrals include: (a) verbal indications by the student of intent to leave school, (b) students with disabilities failing half of course work, and (c) students in danger of not receiving course credits due to excessive absences. DVRS will be revising policies as the Title IV regulations are finalized to further define the point at which pre-employment transition services and VR transition services to eligible clients may begin in order to ensure that pre-employment transition services are available to students at the age at which the student is eligible to receive transition services in NC under IDEA. There are differences in available staff and in numbers of students with disabilities in LEAs and DVRS, which impacts the methods by which the Division with approach this goal, but the Division is committed to using innovative programs and methods to meet its mandates. As contracts for pre-employment transition services are developed, outreach strategies are developed within local interdisciplinary transition teams to consider factors such as program location, timeframe, and capacity to reach the program's targeted sub-group of students with disabilities. As a part of pre-employment transition services program evaluation and monitoring, DVRS continues to seek opportunities for expansion of contracts for the provision of pre-employment transition services by increasing coverage areas of existing contractors and identifying new contractors.

Other Evidence and Historical Information on Collaboration with Education Officials

Since 2003, the Division's Transition Specialist and a school counselor have served together with NC Department of Public Instruction representatives and others to form a statewide capacity building team to develop and provide coordinated transition activities for students with disabilities to achieve better results with post-school outcomes, including obtaining employment or attending post-secondary education. The Division's VR staff participates in an annual Exceptional Children's Conference and regularly scheduled cross training regarding the provision of services at the local level. Specialized cooperative training activities, workshops and conferences have existed over the years and will continue to occur periodically, including both Vocational Rehabilitation staff and educators in conjunction with the requirements of the state's Comprehensive Plan.

DVRS remains active with several organizations serving transitioning youth. With a regular presence on our State Transition Team, grant efforts such as

Reaching the Summit of Success, Post-Secondary Education Alliance, and NC Division of Career Development and Transition, DVRS is well represented in our state. DVRS will host transition training in Spring 2016 that will include presentations by many of our partnering agencies and will focus on policy changes and program development because of WIOA. Our Program Specialist for Transition Services continues to provide extensive outreach to our transition counselors and provides in service training as requested to ensure consistency, encourage creativity in service delivery, and to provide updated information. In addition to improving Pre-employment transition service offerings, the Division continues to expand Project SEARCH™ in NC, with a total of fourteen (14) sites supported this year.

Additionally, the Division continues to be a stakeholder in NC's College

Supporting Transition, Access, and Retention (STAR) program, which provides transition services to secondary students with learning and executive functioning disabilities as they transition to their early

years of college. We look forward to continued innovation and partnerships that will improve the quality of transition services to transition-aged youth.

(e) **Cooperative agreements with private nonprofit organizations**

Private non-profit providers of rehabilitation services are necessary and valuable partners in the delivery of the array of services needed by the individuals eligible for VR services within the state. DVRS routinely seeks out such partnerships especially in geographic areas where additional services and/or service provider choices need to be established. DVRS establishes and maintains contracts or agreements with over 154 private for profit and non-profit VR service providers providing an array of services to DVRS consumers. One hundred two (102) private-non-profit VR service providers have established performance-based contracts with the Division, where the organizations are administered funds when an individual receiving services within their program has achieved designated goals or "milestones" on their way toward their ultimate goal of competitive employment. During federal fiscal years 2014 nearly all supported employment and work adjustment services provided through community rehabilitation programs were transitioned from a fee for services hourly rate payment system to a milestone payment system. Additionally, performance-based cooperative agreements engaging non-profit organizations encompass brain injury support services, multiple (currently 14) Project SEARCH™ sites, Individual Placement and Support Services, and the provision of pre-employment transition services . Details of this system and its implementation were developed in collaboration with the community rehabilitation provider community through representation via the CRP-DVRS steering subcommittee and through feedback solicitations made via web-based feedback mechanisms.

In federal fiscal year 2017, DVRS phased out transitional employment programs as new legislation prohibited the successful closure of an individual employed in transitional employment. Consumers were encouraged to consider Individual Placement and Support Services as an alternate employment service.

DVRS and DSB have jointly collaborated to engage non-profit organizations through an ongoing RFA (Request for Application) advertised through the DHHS website, which is the method of procuring business with non-profit organizations for a variety of services. An interested non-profit service provider who successfully applies can enter an agreement or contract with DVRS once it has gone through the Division's vendor approval process, by which a candidate service provider demonstrates its ability to provide services that meet established standards while fully compliant with all applicable state and Federal requirements. Site reviews are conducted to ensure that programs and services are accessible to individuals served by DVRS. Service rates are based largely on program costs, rates that have been established through researching regional market rates, or through competitive processes. Contracts are implemented through the Division's Center of Excellence Committee (COE), which is a committee established by the NC DHHS Office of Procurement and Contract Services. The committee's purpose is to identify and approve program needs, produce clear meaningful data, identify and approve outcomes, train and assist division/office program staff regarding the contractual procurement of services and reassessment of contract services. The COE includes senior management (director, section chiefs, budget officer) support and involvement. In addition to senior management, the COE includes subject matter experts in contracting, budgeting, programming, policy-making, and technology as applicable. The COE provides continuity to maintain a knowledge base about programs that can include evaluations of several contract services over extended periods of time. This approach shifts the focus from contract processing to program management, ensuring that the scope of work for the service provider is tied to results.

COLLABORATION WITH THE LUMBEE TRIBE AND EASTERN BAND OF CHEROKEE INDIANS

During federal fiscal year 2008, both the Lumbee Tribe and Eastern Band of Cherokee Indians became recipients of RSA's American Indian Vocational Rehabilitation Services (AIVRS) discretionary grants.

From July 2009 - June 2015 and again since October 2016, the program director for the Lumbee Tribal Vocational Rehabilitation program (LTVRS) became a participating member of the State Rehabilitation Council and regularly attends quarterly meetings. Most of the collaborative activity between LTVRS and DVRS occurred in the south-central geographical region of the state, where the tribe is established. DVRS managers located within that region and LTVRS staff developed strategies for interagency referral and information sharing that assists with eligibility determinations and the development of individualized plans for employment for individuals within the covered population. Referrals are regularly made between both agencies. To strengthen and clarify the procedures and expectations of both agencies relating to casework, resource, and training collaboration, an interagency agreement was initially developed, implemented on September 28, 2009. An updated revised interagency agreement became effective July, 2019.

Much of the collaboration between the Eastern Band of Cherokee Indians (EBCI) and DVRS occurs through Vocational Opportunities of Cherokee, Inc., the community rehabilitation program that provides vocational evaluation, work adjustment, and other vocationally-oriented training services for individuals with disabilities who reside on the Cherokee Reservation (Qualla Boundary). DVRS contracts with Vocational Opportunities of Cherokee, Inc. (VOC) for the purchase of these services when it is appropriate for DVRS VR clients who are not members of the EBCI.

DVRS also employs rehabilitation counselors that serve as liaisons with the Cherokee Tribal Vocational Rehabilitation Program, which helps maintain communication channels. Recently, DVRS has worked closely with the Cherokee Tribal Vocational Rehabilitation program to effectively meet the VR needs of eligible individuals in their service area through a collaborative relationship. From July 2015 through August 2016, the Executive Director of VOC/CTVRP served on the DVRS State Rehabilitation Council as the mandatory representative for the AIVRS. DVRS and the Eastern Band of Cherokee Indians updated their memorandum of agreement July 2019.

(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 North Carolina Division of Vocational Services (DVRS) has developed a cooperative agreement with both NC Division of Mental Health, Developmental Disabilities, and Substance Abuse Services (DMHDDSAS) and NC Division of Health Benefits Medical Assistance (DHVMA) for the purpose of establishing cooperative guidelines to ensure individuals with disabilities have equal access to employment services, a continuum of employment services, and independent community living. The relationship among the divisions continues to improve services for both individuals with mental illness and substance abuse disorders and individuals with developmental disabilities has been enhanced over the past several years through changes in personnel at DMHDDSAS as well as a change in their focus towards a recovery-oriented system of care which incorporates employment as a goal for consumers. Due to continuously changing staff, ongoing efforts are required to maintain an effective working relationship between both divisions.

NC DHHS reached an agreement with the US Department of Justice to address the needs of persons with severe mental illness living in adult care homes or were at risk of residing in an adult care home. This agreement became known as Transitions to Community Living Initiative (TCLI). TCLI resolves to address the needs of those who would like to live independently within their community versus an institutional

setting by utilizing evidence based practices. DVRS, DMHDDSAS, and Division of Health Benefits (DHB) are partnering to implement the Individual Placement and Support (IPS) model of supported employment in this state. In 2012 DMHDDSAS received a four-year grant from Dartmouth Supported Employment Center to implement IPS SE. A fifth research site was added in July 2015. Outside of the five research sites is a statewide network of employment providers who are also partnering with clinical behavioral health providers to implement this program.

During federal fiscal year 2018 and 2019, the state's IPS team leaders attended the annual meeting of the Johnson & Johnson/Dartmouth IPS Learning Community meeting in Cleveland, OH along with representatives from the other 21 states, Alameda County, CA, the District of Columbia, and six international countries to learn more about and discuss implementation of the IPS model of SE. DMHDDSAS has also developed a state definition for supported employment and long term vocational support using the IPS model of supported employment as well as increased the hourly rate to meet the needs of the providers. North Carolina's definition calls for the inclusion of Peer Support Services as a mandatory service available to individuals with services paid through funds from the local management entity. Through this definition, if an individual with mental health disabilities chooses DVRS as their supported employment provider and the person is served through the Local Management Entity/Managed Care Organization (LME/MCO) system, they will be able to receive long term vocational supports (LTVS). Each VR office will have a liaison specifically for those provider agencies providing IPS model of SE.

In response to the statewide need for adequate funding of IPS supported employment services, DVRS developed a milestone-based contract for all teams who are contracted by the LME/MCO. Currently, seventeen (17) IPS contracts have been developed. For those providers who have a contract with DVRS to provide supported employment services and also provide IPS model services, the standard supported employment milestones can be accessed until further IPS model contracts are implemented. Through long term collaborative efforts between DVRS and the community rehabilitation program (CRP) providers developing ways in which consumers can be better served through supported employment, the LME/MCOs, will have a dedicated and experienced system of providers to rely on as this state moves forward in developing and funding employment services within the state.

Another partnership NCDVRS has with DMHDDSAS is educating the LME/MCO, VR field staff, and IPS contracted providers concerning the IPS model of supported employment (SE) Representatives from both DVRS and DMHDDSAS are assisting with education and collaboration among all entities to help with implementation throughout the state. LME/MCO systems have increased the number of contracted SE providers as this model becomes more familiar and systems change to include this model. Extensive technical assistance has been provided to facilitate service delivery with local VR and IPS teams as well as broader technical assistance provided through large training sessions, webinar instruction, and one on one assistance. A brochure has been developed to better assist the marketing effort and foster greater informed choice in the selection of the service by consumers.

The established CRP-DVRS steering committee continues to review the provision of supported employment services in North Carolina to ensure that funding is optimally utilized so that adequate funding will be available for ongoing extended services. The steering committee continues to address the issues that surround long term support funding such as inconsistencies in the levels of disability-type funding and shortages as well as looks at other best practices that can be incorporated into the NC service delivery system. In recent years, NC DMHDDSAS has partnered with DVRS to implement an ODEP grant for technical assistance. The goal of this grant was to assist NC in establishing an employment first policy, implement a plan for employer engagement, and develop a unified workforce plan. Executive leadership from DVRS met with other executive leaders from DMHDDSAS, DMA, the Department of Commerce, NCCCS, and DPI to develop the initial objectives and plan for an employment first initiative. DVRS mounted the employer engagement work group that focused on the use of technology, specifically iPads to address barriers to

employment. A national subject matter expert met with select DVR and CRP staff who learned to use the iPad and related apps as well as how to speak with employers on meeting their business needs.

The DVRS Program Specialist for Statewide Community Rehabilitation Programs and six (6) Regional Community Rehabilitation Specialists provide oversight for CRP's to verify that supported employment services provided by the Division will include a transition period in which extended services will be provided jointly by DVRS to assess the individual's performance within their job choice and their individual adjustment and success in their position. This time allows any observed issues to be resolved and an extension of the stabilization phase if necessary.

The continued growth of the statewide network of supported employment service providers has resulted from collaboration between the Division of Vocational Rehabilitation Services and entities such as the North Carolina Association of Rehabilitation Facilities, the North Carolina International Association of Psychosocial Rehabilitation Services, NCCDD and the Mental Health Consumers' Organization. In addition, the North Carolina Association for Persons Supporting Employment First (NCAPSE) provides a forum for focusing on supported employment standards and expanded choices for individuals with the most significant disabilities in the state.

The North Carolina Association of Rehabilitation Facilities (NCARF) and NCAPSE have been heavily involved in the continued development of supported employment services, specifically for persons with intellectual and developmental disabilities. DVRS, NCARF, and NCAPSE have collaborated on training events and the development of new supported employment programs across the state as well as new service models. Community rehabilitation programs, which include facility-based and free-standing programs, provide the majority of supported employment services for persons with the most significant disabilities. New community-based options are expanding through collaboration with NCCCS, the Post-Secondary Education Alliance, DMHDDSA, and with the addition of contracting private providers.

Brain Injury Support Services continue to operate within the state in Greenville, Winston Salem, Raleigh, and Charlotte areas with an interest in expanding to underserved areas of the state. DVRS has recently released a Request for Applications to solicit proposals from providers to provide brain injury services, particularly in areas of the state that are underserved. Selected providers are in negotiations to modify existing models for brain injury services with DVRS and will add at least one additional location for the next federal fiscal year that is currently not served.

Beginning in 2012 and through 2017, the NCCDD funded training and technical assistance for the development of Project SEARCH™ sites across the state of NC. DVRS has been a core partner of each of the fourteen (14) Project SEARCH™ programs developed in NC and contributes to the braided model by funding internship, job placement, and job training services for program participants. DVRS has committed to funding a statewide Project SEARCH™ specialist position to support continued growth and collaboration for this evidenced-based model of supported employment. Finally, DVRS maintains active membership on several statewide advisory boards, including on the NC Brain Injury Statewide Advisory Council and the Mental Health Planning Council. Established through legislative mandate in the 2003 General Assembly, the NC Brain Injury Advisory Council's mission is to review the current definition of traumatic brain injuries, promote interagency collaboration among state agencies serving this population, study the needs of persons with traumatic brain injuries and their families, make recommendations regarding a comprehensive service system for this population, and promote and implement injury prevention strategies across the state. The Mental Health Planning Council meets quarterly to review the annual Mental Health Block Grant Plan and to submit to the state any recommendations of the Council for modifications to the plans. The Planning Council also serves as an advocate for adults with a serious mental illness, children with a severe emotional disturbance, and other individuals with mental illnesses or emotional problems; and monitors, reviews, and evaluates the adequacy of mental health services within the state.

In addition, DVRS represents the agency on the "Governor's Working Group on Service Members, Veterans, and their Families," which is a collaborative monthly meeting that serves as a resource clearinghouse for addressing issues of returning veterans from Iraq and Afghanistan and other service members. Outreach efforts between DVRS, the Veterans Administration, and other military operations have occurred to ensure that veterans and their family members are aware of services available to them through DVRS.

An agreement between DVRS and Veterans Administration's Vocational Rehabilitation Program was implemented in late 2014, which is intended to maximize mutual services for Veterans and ensure a more streamlined referrals process between the two agencies.

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:

VR services

(g) **Coordination with Employers: General Overview**

DVRS continues to utilize a dual customer approach by providing services to both businesses and individuals with disabilities. The Division emphasizes the definition and marketing of business services to ensure the dual customer approach is recognized and implemented. Business services include recruitment, hiring, consultation on Section 503 compliance, sensitivity/diversity training, accessibility consultation, internships, On-the-Job Training (OJT), education on tax incentives, and follow-up and job retention services. NC DVR continues to market business services by employing 70 community employment program specialists that serve the statewide program. These individuals often have education and experience in a business-related field, such as human resources and marketing, so that DVRS is equipped with personnel who understand the needs of employers. In addition to providing individualized job seeker services, the business relations representatives connect with local industry through participation in networking events and working relationships with workforce system partners.

The performance of business relations representatives is measured, in part, by assessing relationships with business as evidenced by direct and indirect placements of eligible jobseekers with disabilities. DVRS believes that relationships with employers is the essence of creating positive connections between jobseekers and business, and that providing follow-up and technical assistance to businesses fosters these relationships so that they can have a sustainable impact in supporting the individuals with disabilities in finding, maintaining, and advancing in employment.

DVRS services to job seekers intersects with business services in the areas of vocational evaluation and career development, job seeker preparation, and job development and job placement of individuals with disabilities who are ready to work. DVRS staff continue to be trained in the dual customer approach and employment outcomes in order to identify these intersection points between the VR services that DVRS provides to jobseekers and those services provided to business. The unique role of the business relations representatives highlights this intersection well.

In 2016, DVRS incorporated several changes to our internship program to better meet the needs of interns and business. Changes included providing worker's compensation coverage for interns, internal management and distribution of funds for internship wages, and improved guidance on selecting internship opportunities that promote training and preparation across a variety of industries and levels of employment. As a result of these changes, DVRS' utilization of internship services (funding) increased by 800%. DVRS plans to continue promoting the use of internships as a means for exposing the diverse talent pipeline of individuals with disabilities to business in our community.

DVRS staff, including business relations representatives, will continue to develop relationships with business based on the individual placement needs of eligible individuals with disabilities who are placement-ready. Employers will be engaged in the individual preparation of job seekers with disabilities by involving them in Employment Marketing Skills training classes as well as Job Clubs. Employers participate in job interview preparation of job seekers in addition to information-sharing with job seekers about employer expectations in general and within their specific industry.

Additionally, DVRS has invested in disability sensitivity training in 2018 to promote the transition of students with disabilities to employment after high school. DVRS community employment program specialists will received Windmills Sensitivity Training with special focus on promoting the diversity and talent of students with disabilities as they exit high school and embark on career pathways. Train the

Trainer workshops will be held in December 2019 to train new business relations representatives and State Office personnel. Windmills Training will continue to be a viable business service that we offer to all employers who are interested in diversifying their workforce. Furthermore, DVRS will continue to pursue customized training partnerships like one developed with Fenner Drives in 2016. This project engaged high school students with significant disabilities in semester-long employer-based training at the Fenner Drives facility, located in Wilmington, NC. The students earned school credit while they gained career exploration and specific skills in the manufacturing industry and were provided internship wages and on-the-job supports. A very similar customized training partnership has been established with New Hanover County Schools which provides work-based learning for an underserved population and will serve as a pipeline for difficult to fill positions in environmental services within New Hanover County Schools. DVRS aims to identify additional opportunities to prepare workers for local jobs using a combination of supports and employment training services and by engaging with other workforce partners (e.g., community colleges).).

DVRS plans for continued emphasis on the number and depth of our business relationships. DVRS is making steps to procure a replacement case management system by 2021 and has developed requirements for an account management component of this system. The objective of account management features is to provide improved customer service and strategic planning towards services to business. DVRS hopes to be a part of regional initiatives around engaging with business and aims to be participatory and responsive to business needs across internal organizational boundaries.

Transition services, including pre-employment transition services, for students and youth with disabilities

While youth and students with disabilities have access to the same VR services as adults, there are some VR services reserved for or targeted to transition-aged youth for the purposes of assisting them with leaving high school and preparing for competitive employment. DVRS continues to work towards meeting its 15% required spending allocation for pre-employment transition services to students with disabilities.

Since 2014, DVRS has worked towards implementing pre-employment transition services in the following ways:

- Enhancing existing pre-employment transition service delivery models and developing tracking and reporting mechanisms consistent with federal regulations. For example, as a result of changes to our internship program, more students with disabilities have participated in work-based learning through internship opportunities. Additionally, work-based learning and workplace readiness components of the Project SEARCH™ model continue to be provided to students with disabilities in eleven (11) of the fourteen (14) sites across NC.
- Contracted pre-employment transition services: At the time of this report, thus far in FFYs 2017 and 2018, DVRS implemented sixteen (16) pre-employment transition services contracts with community rehabilitation programs and community agencies for the provision of two or more of the five (5) pre-employment transition services required activities. Through these contracts, DVRS has the capacity to reach 2000 students with disabilities.
- Local transition planning to identify opportunities for DVRS staff to provide pre-employment transition services in a way that best meets the needs of students with disabilities in each local education agency
- Developed agreement with the Juvenile Education Services Division of the state's Department of Public Safety to provide pre-employment transition services to students with disabilities in NC's four youth development centers serving adjudicated youth. DVRS has also committed funds to a pre-employment transition services Coordinator who will directly provide pre-employment transition services to these students.

Through the mechanisms described above and others, DVRS will continue to work towards meeting its 15% spending obligation for pre-employment transition services. Additionally, DVRS is pursuing a number

of pre-employment transition services authorized activities to build capacity for effective and innovative practices for transitioning students with disabilities from school to postsecondary education and competitive integrated employment outcomes. Authorized activities being pursued include: informational fairs; training opportunities for VR, education, and community agency staff; research on pre-employment transition services service outcomes; and model demonstration projects for innovative pre-employment service delivery methods.

DVRS will continue to coordinate with local and state education agencies under revised formal agreements to best align resources and services to students with disabilities across the state in the areas of pre-employment transition and transition services. DVRS' agreements with local school districts enables DVRS to employ approximately 130 staff who are dedicated to providing, coordinated, and arranging for pre-employment transition services and transition services to students in the partnering districts. These agreements enable DVRS to provide expertise on VR transition services to students in these districts through coordinated service delivery strategies as well as local systems level consultation, coordination, and planning.

(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:

The State Medicaid Plan under Title XIX of the Social Security Act

The NC DHHS Division of Health Benefits (DHB) is the state agency responsible for administering the State Medicaid plan under title XIX of the Social Security Act. DVRS has developed a cooperative agreement with DHB to ensure that individuals with the most significant disabilities have equal access to VR and best practice employment services. DHB is a lead partner agency, in addition to the DVRS and DMHDDSAS, for the implementation of the Individual Placement and Support (IPS) model of supported employment in North Carolina, as described in Section F of the General VR Portion of the Unified Plan. Additionally, the case management system for the VR program has an interface with the State's Medicaid information system, "NC Tracks," for the purpose of identifying rates to support the purchase of medical equipment and services for VR participants as part of their vocational rehabilitation program.

The state agency responsible for providing services for individuals with developmental disabilities

DVRS is partnering with the DMHDDSAS and other divisions and departments in developing competitive, integrated employment opportunities for individuals with intellectual and developmental disabilities through initiatives such as the recent technical assistance grant from the U.S. Department of Labor, Office of Disability Policy (ODEP). With ODEP funded technical assistance from a national subject matter expert, progress was made in modifying service definitions which will lead to much greater supports and sharing of resources. Through this technical assistance grant, the DMH/DD/SAS is exploring a pilot project with LME/MCOs where a select group of providers of IPS services for individuals with mental illness will model the DVRS milestone format for contracted outcomes. DVRS continues to contract with providers to provide specialized services for traumatic brain injuries in the Charlotte, Winston-Salem, Raleigh, and Greenville areas and surrounding counties. This service model consists of a blend of cognitive rehabilitation therapy along with career exploration, job placement and extended services. DVRS will continue to look toward expanding availability of such services in unserved and/or underserved areas of the state. DVRS is represented at the NC Statewide Brain Injury Advisory Council.

Staff from the Employment and Program Development Section continues to represent DVRS at the Governor's Working Group on Veterans, Service Members and their Families. DVRS is actively engaged with other resource groups to promote DVRS as a resource for veterans and service members and their families.

The state agency responsible for providing mental health services.

DVRS continues to partner with the DMHDDSAS in implementing individual placement and support supported employment (IPS SE) throughout the state. Currently, there are 35 38 fidelity IPS SE teams with 19 unique providers programs throughout the state and DVRS contracts with 1813 of them. DVRS offers such programs the opportunity to apply to become and IPS contractor through an ongoing RFA. DVRS also works alongside the DMHDDSAS and the University of NC Chapel Hill

Institute for Best Practices staff to conduct onsite fidelity reviews of the IPS SE programs, training of IPS Teams, including DVRS field staff, statewide IPS learning collaborative, provider steering committees, monthly calls with the

Rockville Institute (formerly the Dartmouth Supported Employment

Center), as well as the annual IPS SE Rockville Institute's Learning Collaborative. DVRS also works with DMHDDSAS to inform providers and beneficiaries on the impact of employment on federal and state benefits and have collaborated in efforts to increase capacity of benefits counseling experts in the state.

(i) **Comprehensive system of personnel development**

Including 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:

Data system on personnel and personnel development

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:

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;

DVRS utilizes the state human resource and payroll system called Building Enterprise Access for North Carolina's Core Operations (BEACON), which was fully implemented in 2008. Reports on staff positions and vacancies pertaining to the Unified Plan are customized from this system. Data on the number of VR program participants are provided through the BEAM case management and service payment system.

The table below shows the number of personnel employed in the provision of VR services in relation to the number of individuals served, broken down by personnel category. In total, the ratio of VR counselors to individuals served is 53,013 served / 370 total counselor positions or 143:1 for DVRS.

Number of personnel who are employed in the provision of VR services in relation to the number of individuals served, and vacancies by personnel category:

Job Title	Total positions
Rehabilitation Counselor I	213
Rehabilitation Counselor II	98
Rehabilitation Counselor in Charge	59
Rehabilitation Admin Counselor I	3
Rehabilitation Admin Counselor II	14

Job Title	Total positions
Rehabilitation Admin Counselor III	14
Vocational Evaluator II	42
Community Employment Program Specialist	70
Human Services Coordinator I	0
Human Services Coordinator II	4
Rehabilitation Casework Tech	117
Processing Assistants	101
Total	735

the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

Currently, DVRS has funded the following VR service positions:

Job Title	Total positions
Rehabilitation Counselor I	213
Rehabilitation Counselor II	98
Rehabilitation Counselor in Charge	59
Rehabilitation Admin Counselor I	3
Rehabilitation Admin Counselor II	14
Rehabilitation Admin Counselor III	14
Vocational Evaluator II	42
Community Employment Program Specialist	70
Human Services Coordinator I	0
Human Services Coordinator II	4
Rehabilitation Casework Tech	117
Processing Assistants	101
Total	735

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.

The total number of individuals served through the DVRS VR Program has not increased in the past several years and an increase in funded positions is not expected. The number of positions is not expected to change. At this time, DVRS projects the number of positions as follows:

Job Title	Total positions
Rehabilitation Counselor I	213
Rehabilitation Counselor II	98
Rehabilitation Counselor in Charge	59
Rehabilitation Admin Counselor I	3

Rehabilitation Admin Counselor II	14
Rehabilitation Admin Counselor III	14
Vocational Evaluator II	42
Community Employment Program Specialist	70
Human Services Coordinator I	0
Human Services Coordinator II	4
Rehabilitation Casework Tech	117
Processing Assistants	101
Total	735

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:

a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

DVRS works closely with all of North Carolina's Rehabilitation Counseling university programs of study through advisory board participation, internships, and partnerships in conferences and training events. Institutions of higher education in NC that are preparing VR professionals include:

NC A&T University:

- Mental Health Counseling - Rehabilitation Master's Program; Doctor of Philosophy (Ph.D.)
- Rehabilitation Counseling & Rehabilitation Counselor Education;
- Certificate in Rehabilitation Counseling & Behavioral Addictions;
- Certificate in Rehabilitation Psychology & Behavioral Medicine; and
- Certificate in Vocational Evaluation & Work Adjustment.

Winston Salem State University: Master of Science in Rehabilitation Counseling with program focus specialization offered in Deaf & Hard of Hearing, Rural Transition, Vocational Evaluation, Rural Vocational Rehabilitation, and Clinical Mental Health.

University of NC at Chapel Hill: Master of Science in Clinical Rehabilitation & Mental Health Counseling.

East Carolina University: Master of Science in Rehabilitation & Career Counseling; Certificate in Rehabilitation Counseling; Certificate in Vocational Evaluation; Certificate in Substance Abuse Counseling; and Certificate in Military & Trauma Counseling.

the number of students enrolled at each of those institutions, broken down by type of program

NC A&T University:

Mental Health Counseling - Rehabilitation Master's Program, **28 students**
Doctor of Philosophy (Ph.D.) Rehabilitation Counseling & Rehabilitation Counselor Education, **28 students**
Certificate in Rehabilitation Counseling & Behavioral Addictions, **10 students**
Certificate in Rehabilitation Psychology & Behavioral Medicine, **1 student**
Certificate in Vocational Evaluation & Work Adjustment, **0 students**
Winston Salem State University:

Master of Science in Rehabilitation Counseling, **38 students**
UNC at Chapel Hill:

Master of Science Clinical Rehabilitation & Mental Health Counseling: **47 students**
East Carolina University:

Master of Science Rehabilitation & Career Counseling, **20 students**
Master of Science Clinical Counseling, **47 students**
Certificate in Rehabilitation Counseling, **7 students**
Certificate in Vocational Evaluation, **10 students**
Certificate in Substance Abuse Counseling, **13 students**
Certificate in Military & Trauma Counseling: **14 students**

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.

NC A&T University:

Mental Health Counseling - Rehabilitation Master's Program, **5 graduates (1 hired DVRS)**
Doctor of Philosophy (Ph.D.) Rehabilitation Counseling & Rehabilitation Counselor Education, 7 graduates
Certificate in Rehabilitation Counseling & Behavioral Addictions, **5 graduates**
Certificate in Rehabilitation Psychology & Behavioral Medicine, **unknown**
Certificate in Vocational Evaluation & Work Adjustment, **unknown**
Winston Salem State University:

Master of Science Rehabilitation Counseling: **9 graduates**
UNC at Chapel Hill:

Master of Science Clinical Rehabilitation & Mental Health Counseling: **21 graduates**
East Carolina University:

Master of Science Rehabilitation & Career Counseling: 5 graduates
Master of Science Clinical Counseling: 26 graduates
Certificate in Rehabilitation Counseling: 1 graduate
Certificate in Vocational Evaluation: 4 graduates
Certificate in Substance Abuse Counseling: 6 graduates
Certificate in Military & Trauma Counseling: 8 graduates

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.

DVRS coordinates an unpaid internship program through our Staff Development section with the support of management, Human Resources, and counselors across the state. Because North Carolina has the benefit of several Universities with Rehabilitation Counseling programs, many of which also receive RSA grant funds for student scholarships, we have many students seeking internships with our agency. This often leads to the student intern hired for a Rehabilitation Counseling position; an important recruitment tool for

us. Many of our hired interns have been from the two Historically Black Universities in our state; NC Agricultural & Technical (A&T) State University and Winston-Salem State University.

The Professional Development & Training section improved and streamlined our processes for working with students, universities and DVRS offices in 2018 to ensure effective communication and support. We developed a Practicum/Internship Users Guide which provides the forms necessary to ensure timely processing of the student application, an easy to follow flow-chart, and clearly defined responsibilities for all involved: the Rehabilitation Education Specialist, the student, the university coordinator, the unit office and lead office assistant, and the site supervisor. The Professional Development and Training section's Rehabilitation Education Specialists act as the liaison and coordinator for all these parties. This has greatly enhanced our success in this area. Training was provided on the new process and the opportunity to recruit qualified rehabilitation counselors to our agency through the internship program via a webinar and during our Statewide Managers Meeting.

We also have worked with the following Universities to support student internships in our agencies, and have established MOU's with them for this purpose:

Carteret Community College, NC
George Washington University, Washington DC
Lenoir-Rhyne University, NC
Texas Tech University, TX
The University of Wisconsin, WI
Thomas University, GA
University of Mount Olive, NC
University of Buffalo, NY
University of the Southwest, NM
West Virginia University, WV
Western Piedmont Community College, NC
Wingate University, NC
DVRS personnel work closely with the University Rehabilitation Counseling programs and staff. We participate in their advisory boards, support their submission for grants and the creation of new programs, collaborate to deliver training at conferences and agency-wide training events, and provide presentations for their students when requested. For example, we worked with the staff of the University of North Carolina at Chapel Hill to provide agency-wide training programs on ethics, wellness and serving individuals with Autism during 2018-19. Our Rehabilitation Education Staff visit the University Rehabilitation Counseling programs on a regular basis to learn more about how our agency can continue to support their students and their programs. Our partnerships with these institutions are further encouraged by staff enrolling in Rehabilitation Counseling Masters and Certificate programs to enhance their professional development and help them obtain promotional opportunities within our agency. In addition, our local unit offices are encouraged to partner with universities and colleges at local career fairs and events.

To assist with both retention and filling vacant leadership positions, a new *pre*-leadership training program was created and launched during this timeframe, called STEP UP (Supervisory Training Essentials for People Unlocking Potential). STEP UP is a 5-session training series designed to help develop, prepare and retain high-performing and high-potential staff for possible leadership opportunities within DVRS. Employees applied for this program; completing essays, references and interviews for acceptance. Eighteen participants were selected from a pool of 25 candidates to participate in this series, which began March 2019 and is scheduled to end November 2019. As of this writing, 6 participants, 33% of the class, have accepted leadership positions within our agency. Only one participant (5%) has left the agency, which is much lower than our current turnover rate. This series is enthusiastically supported by managers at all levels of the organization and has been so successful that a second series is planned for launch in 2020.

Nationwide recruitment is now done by posting positions in NeoGov, an Internet Human Resources Application Provider for Government Agencies. NeoGov has eliminated the need for numerous individual contacts to advertise available positions and has expanded the available applicant pool. A section on DSB's website labeled, "Career Opportunities" links browsers to

NeoGov listings. Plans have also begun to begin to alert the universities with Rehabilitation Counseling Programs to openings as posted to further encourage qualified applicants.

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) and 34 CFR 361.18(c) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

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

While DVRS modeled the counselor personnel standard after the CRCC, the Division also initiated its own comprehensive standard with more specific listing of degrees that it will accept.

Effective October 1, 2008, this standard-related requirement for a Rehabilitation Counselor hire included:

Master's degree in Rehabilitation Counseling;
Master's degree in a closely related field such as Counseling, Social Work, Psychology, Special Education, Communication Disorders, Human Services;
Current certification as a Certified Rehabilitation Counselor or Licensed Professional Counselor;
Current enrollment in a qualifying master's degree program AND graduation occurs prior to the date of hire.
As of December 21, 2009, all employees in the Rehabilitation Counselor I and Rehabilitation Counselor II roles met the CSPD mandate. Although the mandate has been lifted, DHHS has not at this time changed its policies regarding minimum requirements for the VR counselor position but has explored using the minimum credentialing standard as a preferred recruiting standard for positions that are in locations particularly difficult to recruit for. This is allowable as per the Workforce Innovation and Opportunity Act. Currently, employees that do not meet the minimum education requirements serve in trainee status and not function as a Rehabilitation Counselor and must progress toward attaining the necessary requirements outlined in a Memorandum of Agreement within the specified timeframe. If the employee does not meet the specified requirements or they are not progressing at an acceptable rate, the employee is separated during their probationary status period.

The VR program currently averages around 10 qualified applicants for each vacancy, which is primarily attributable to the current economic climate. This means that recruitment for Rehabilitation Counselor I and Rehabilitation Counselor II positions have not been as challenging as in years past. DVRS does find it more challenging to find individuals prepared to serve a Deaf and Hard of Hearing caseload, but these vacancies have not been impossible to fill.

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.

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Current enrollment in a qualifying master's degree program AND graduation occurs prior to the date of hire.
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The VR program currently averages around 10 qualified applicants for each vacancy, which is primarily attributable to the current economic climate. This means that recruitment for Rehabilitation Counselor I and Rehabilitation Counselor II positions have not been as challenging as in years past. DVRS does find it more challenging to find individuals prepared to serve a Deaf and Hard of Hearing caseload, but these vacancies have not been impossible to fill.

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:

System of staff development
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 DVRS provides a comprehensive system of staff development for VR professionals and paraprofessionals, particularly with respect to service delivery, specific disabilities, assessment, vocational counseling, job placement, transition services, rehabilitation technology, employee engagement, supervisory skills and leadership development. This includes training provided by the DVRS Professional Development & Training team's Rehabilitation Education Specialists, Rehabilitation Program Specialists, Assistive Technology Specialists and Quality Development Specialists, as well as agency participation in collaborative training events and statewide conferences. Agency staff may also participate in training offered through the NC Department of Health and Human Services as well as the NC Office of State Human Resources.

Agency training sessions are conducted through customized instructor-led sessions and online learning experiences. Continuing education units are provided in the form of CEU and CRC credit for all internal training programs. Conference attendance is encouraged and supported, including registration and reimbursement for travel and per diem. In addition, the Professional Development and Training section also provides training, facilitation and team building to small groups, offices and sections upon request and as feasible.

A total of 15 internal agency-wide instructor-led sessions were provided during this timeframe, providing 99 classroom contact hours. DVRS also sponsored 636 staff to attend 15 different professional conferences during this timeframe. Overall, there were more than 1,650 participants engaged in 43 training events, including the classroom sessions, conferences and webinars listed below.

Instructor-led Training (15 sessions; 99 contact hours)

- LAAL-IC Dealing with Change (2 sessions, 3.5 contact hours)
- LAAL-S Leading Teams for Supervisors (6 contact hours)
- Diversity Awareness: Understanding Bias for Managers (2 sessions, 6 contact hours)
- Learning Styles of Autism & the Impact in Employment (3 sessions, 5.5 contact hours)
- Improving Vocational Outcomes for Individuals with Autism (13 contact hours)
- Effective Communication (3 contact hours)
- STEP UP Leadership Development Program (2 of 5 sessions)
- Session 1 (15.5 contact hours)
- Session 2 (13.5 contact hours)
- Deaf & Hard of Hearing Fundamentals: Breaking Barriers (13.5 contact hours)
- Mental Illness Training (5.5 contact hours)
- "Let's TALK" Communication Skills for Supervisors & Managers (14 contact hours)

Webinars (13 sessions; 1.0 – 1.5 contact hours each)

- IPS 101 & Beyond (4 sessions)
- Interpreting Third Party Query (TPQY) Reports (2 sessions)
- Internships 101
- Learn to Use the Learning Management System (LMS)
- Managing Training in the LMS for Supervisors
- Training for Non-Training Types!
- Change your Game: Learn to Reframe
- iLife
- Neurological Impairments--Medical Records Review

Conferences (15 events; 636 participants)

- NC Foundation for Alcohol & Drug Studies Winter School (32 participants) & Summer School (29)
- NC Association of People Supporting Employment (NCAPSE) Spring Conference (32) & Fall Conference (15)
- Vocational Evaluation & Work Adjustment Association (VEWAA) Spring Conference (14) & Fall Conference (16)
- NC Association of Rehabilitation Facilities (NCARF) (21)
- Intellectual & Developmental Disabilities (IDD) Services Conference (20)
- NC Division on Career Development & Transition (NCDCDT) (65)
- NC Rehabilitation Association (NCRA) (197)
- South East Regional Institute on Deafness (SERID) (12)
- NC Workforce Development Conference (77)
- Med Trade Expo (5)
- Statewide Managers Meeting (101)

The Assistive Technology (AT) Expo is also a yearly event that our staff are encouraged to attend. This conference is managed in its entirety by the NC Assistive Technology Program and is a free conference. Registration for this event was not needed and therefore not tracked by the Professional Development & Training section.

A new pre-leadership training program (referred to in section 2) was created and launched during this timeframe, called STEP UP (Supervisory Training Essentials for People Unlocking Potential). STEP UP is a 5-session training series designed to help develop, prepare and retain high-performing and high-potential staff for possible leadership opportunities within DVRS. The program seeks to allow participants to explore their own interests, abilities and potential for agency leadership positions while developing basic supervisory skills and knowledge to enhance their leadership skills and potential. The core components of the program include organizational operations and workflow; leadership styles and competencies;

communication skills and strategies; human resource management and development; accountability and resolving conflict; and building image, teams and community. Eighteen participants were selected from a pool of 25 candidates to participate in this series, which began March 2019.

In addition to the above, individuals can request to attend local training events and conferences upon approval of their manager and utilizing office administrative funding.

New employees receive both mandatory and optional training opportunities. Mandatory training generally takes place online, and includes:

- Onboarding Introduction for New NC-DVRS Employees
- DHHS-DSB/DVRS SSA Contract Training;
- Preventing Workplace Harassment;
- HIPAA training;
- Investigating Workplace Violence;
- Bloodborne Pathogen Awareness Training;
- NCVIP Employee Performance Management training curriculums;
- Be a Hazard Hero Safety Training;
- Slips, Trips & Falls Safety Training;
- OSHR Safety: Incident Investigation & Reporting Procedures;
- DHHS Active Shooter training;
- and a wide variety of IT Security sessions assigned every other month

In 2016 a Peer Advisory Leader (PAL) Mentoring Program was developed and implemented through the Professional Development & Training section to assist new employees with knowledge and understanding of the agency's mission and goals, and to aid in employee retention. New employees are paired with a more experienced peer mentor located in a different office for a period of six-months to assist in the employee's successful adjustment to their new position. PAL mentors are provided training at the beginning of their commitment and participate in monthly check-in phone-calls to ensure that the mentoring relationships are going smoothly. During 2016, seventy-three (73) Peer Advisory Leader Mentor relationships were developed with new hires across the state. In 2017 the program mentored 51 new hires and in 2018, 58 new hires were mentored. Now in our fourth year, we are currently mentoring 34 new hires.

Suggested training for non-supervisory staff includes the Leading at All Levels (LAAL) program curriculum for individual contributors, which consists of classroom training on customer service, workplace ethics; communicating with your team; dealing with change; out of the box thinking and exploring supervision for those not yet in a leadership role.

In addition to the above listed training, new supervisors and managers receive both mandatory and optional training opportunities. Mandatory training includes:

- Grievance Overview;
- Equal Employment Opportunity & Diversity Fundamentals;
- Effective Hiring;
- Introduction to Recruitment and Selection;
- and NCVIP Performance Management training curriculums

Suggested training for leaders includes both classroom and online sessions, such as: "Coaching the NCVIP Way"; "Disciplinary Action Process"; "Stress Awareness for Supervisors & Managers". The Leading at All Levels (LAAL) program curriculums also has a track for supervisors or managers, which includes "Supervisory Foundations"; "Managerial Foundations"; "Leading Teams for Supervisors"; "Coaching for Supervisors"; "Managing Work for Supervisors"; and "High Performance Coaching for Managers". More experienced managers were supported in participating in the "Advanced Skills for Managers" training series and the 14-month "Certified Public Manager Program", both provided by the NC Office of State Human Resources.

Additional training is provided at the agency's annual Statewide Manager's Meeting. The May 2019 meeting theme was "Strength, Growth & Wisdom: A Year of Possibilities", and included training on workforce planning, managing university student internships, Medicaid transformation, and the NCCARE360 Healthcare Data System.

Acquisition and dissemination of significant knowledge

Procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

DVRS staff acquire and disseminate information, including knowledge from research and other sources, through conferences and trainings as described in the preceding section, 4(a), and through regularly scheduled meetings, instructor led training, webinars and online trainings, reports and publications, email distribution, monthly and quarterly newsletters, and through posting information on its intranet site, which includes section materials, policy updates, reports, case management system changes, and links to other information sources. Information is also shared at collaborative meetings among staff and leaders across the state. At the 2018 Statewide Manager's Meeting previously referenced, information was shared through presentations on the WIOA Quarterly Report Requirements & Agency Performance; Pre-Employment Transition Services Update, and Employee Assistance Performance (EAP) Services & Resources. DVRS also retains subject matter experts who serve as statewide program specialists in the areas of medical consultation, deaf and hard of hearing; mental illness and substance abuse; developmental disabilities and brain injury; transition-age youth, business relations; community rehabilitation programs; assistive technology and rehabilitation engineering. Domain-specific knowledge is shared by the program specialists with regional and local office staff at meetings, trainings, reports, presentations, and conferences.

In 2016 a Peer Advisory Leader (PAL) Mentoring Program, mentioned above in 4(a), was developed and implemented through the Professional Development & Training section to assist new employees with knowledge and understanding of the agency's mission and goals, and to aid in employee retention. New employees are paired with a more experienced peer mentor located in a different office for a period of six-months to assist in the employee's successful adjustment to their new position. The PAL's program helps new employees build an optimistic attitude and motivation for job performance, productivity and acceptance of responsibility with confidence. PAL's also encourages socialization, networking beyond their local office, and a sense of belonging in professional and customer service relationships. Our PAL's Mentors provide continuous accessibility to NC DVRS resources in support of all employees. During 2016, seventy-three (73) Peer Advisory Leader Mentor relationships were developed with new hires across the state. In 2017 the program mentored 51 new hires and in 2018, fifty-eight (58) new hires were mentored. In our fourth year now, we are currently mentoring 34 new hires. The program is deemed to be very valuable to our organizational success, and the results thus far are notable. Plans to potentially expand PAL's program to mentoring new supervisors is being explored and continues to receive support from the highest levels of the organization.

<u>Personnel to address individual communication needs</u>

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.

DVRS acknowledges communication as a vitally important aspect of the rehabilitation process from start to culmination and remains committed to the provision of services that enable individuals who have specific communication needs to participate in their rehabilitation program. Further, these interpreting and translation services have been identified as essential for quality and success in the delivery of VR services.

DVRS counselors have the responsibility for determining the individual's preferred language and providing a qualified foreign language interpreter/translator at the earliest possible opportunity, before or after the initial contact with the Division. This translation service is provided at no cost to the person with Limited English Proficiency (LEP). A specific budget (budget code 1292) is designated solely for the provision of this service. The interpreters/translators for all languages, including American Sign Language, must be qualified and trained with demonstrated proficiency in both English and the native language of the client. The Department of Health and Human Services has a contract with the Language Line in which assists the department in meeting the needs of foreign language interpretation and information requests through the phone. DVR can take advantage of this service and utilizes the translation services of these Foreign Language Interpreters via the phone where Spanish as well as many other languages are available. All fundamental VR and IL forms are available in Spanish for individuals with Limited English Proficiency (LEP). Information on how to access the Language Line and LEP materials is in our internal SharePoint website. The DVRS public website is also in Spanish for the section regarding VR Services to Consumers.

During federal fiscal year 2018-19, DVRS employed 13 counselors proficient in American Sign Language with caseloads specifically serving deaf and hard of hearing individuals. There were also 10 technicians, 3 Business Relations Representatives, 1 Human Service Coordinator, 1 Program Specialist, and 1 Assistive Technology consultant for the deaf who support these counselors and the consumers being served. Approximately 11 interpreting agencies and over 159 independent licensed interpreters contract with the Division and are paid out of this budget.

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.

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.

North Carolina's public education system continues to be locally controlled through 115 county or city-wide school districts in addition to over 100 charter schools. Therefore, DVRS works with state and local education officials to coordinate services to students with disabilities.

At the state level, DVRS participates on the State Transition Team. The full State Transition Team convenes at least twice a year to monitor progress on the State Transition Plan.

At the state level, DVRS participates on North Carolina's State Transition Team consisting of members from DVRS, NC Department of Public Instruction (DPI) representatives, college/university representatives, parents, students, and various community and advocacy organizations with a focus on the transition of students with disabilities from school to employment or post-secondary education. There is also a core sub-team of staff members representing DVRS, the NCDPI Exceptional Children Division, and the NCDPI Career and Technical Education Division. The core team members update the State Transition Plan annually. The 2019-2020 State Transition Plan goals include: (1) improving provision of services in inclusive settings, improving soft skill development, and improving self-determination and self-advocacy skills through interagency collaboration and (2) improving student and parent knowledge of and engagement in the transition planning process through the provision of resources, guidance documents, and tools

The NC Secondary Education and Transition Services planning team began in SFY 2011 with the purpose to execute the original transition training objective identified in the state plan. As a strategy for achieving the goals of the State Transition Team, the core team members and the DVRS Professional Development and Training section have worked diligently to develop joint training and technical assistance opportunities for

VR staff and stakeholders, including educators and transition professionals whose positions are funded locally through IDEA funds. Past joint training events have included a two-day 2016 NC DVR & DSB Joint Transition Conference six NCDVR-NCDPI 2017 Joint Regional Transition trainings, four one-hour webinars as a two-part series to familiarize staff and partners with policies on transition services, and a 2018 Pre-Employment Transition Services Grantee Summit for local transition teams implementing pre-employment transition services contracts.

DVRS regularly supports participation in joint conferences including the NC Division of Career Development and Transition as well as the NC Exceptional Children's Conference. The DVRS State Transition Team representative participates annually in the National Capacity Building Institute as well as related communities of practice webinars which offer interagency training that promotes the transition of students with disabilities for post-school success. Through the State Transition Core Team, DVRS is coordinating additional opportunities such as joint training for VR and school staff through the Youth Technical Assistance Center (Y-TAC), Beyond Limits© Self-Advocacy training for DVRS staff to make available to students in partnering school districts, a Special Collaborative Meeting to support local transition teams in using team planning tools for local innovation, and a follow-up Pre-Employment Transition Services Grantee Summit for current pre-employment transition services contractors and related transition teams. These trainings and technical assistance opportunities are examples of efforts towards customized personnel development that is being offered to achieve shared goals of the SEA, LEAS, and DVRS. The State Transition Core Team with support of the DVRS PD&T team aims to continuously refresh and update training and TA to meet the needs of local transition teams by way of a training & TA request mechanism that allows the state agency partners to coordinate and prioritize training efforts for staff and stakeholders supporting students with disabilities.

(j) **Statewide assessment**

Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the state, particularly the VR services needs of:

Individuals with the most significant disabilities, including their need for supported employment services

Individuals with most significant disabilities (MSD) are defined as those whose physical or mental impairments require interventions or permanent accommodations that cannot be easily achieved to mitigate their limitations in three or more functional capacities regarding employment, such as communication, interpersonal skills, mobility, self-care, self-direction, work skills, and work tolerance. For the disabling condition to meet the definition of "most significant," such individuals must either require multiple core VR services for a minimum of nine months to complete their vocational rehabilitation program or require personal assistance services, rehabilitation technology, or extended services for their employment.

In program year 2018-19, Individuals with MSD accounted for 13,372 (30.9%) of 43,255 eligible DVRS VR consumers served.

Within the MSD population, 4,583 (34.3%) were individuals whose primary disability was an intellectual disability; 3,376 (25.2%) were individuals with mental illness, other than substance abuse, as their primary disability; 2,236 (16.7%) had autism as their primary disability; 1,491 (11.1%) had a physical impairment as their primary disability; 948 (7.1%) had ADHD, learning disabilities, or other cognitive impairments as their primary disability; substance abuse was the primary disability for 241 (1.8%); deafness or a hearing impairment was the primary disability for 169 (1.2%) and 39 individuals had blindness or another visual impairment as their primary disability.

Individuals with MSD ranged in age from 14 to 75, with 24 as the median age and 29 as the average age. Of the 13,372 eligible VR consumers with MSD, 6,755 (50.5%) were transition age youth, younger than 25; 5,524 (41.3%) were ages 25 to 54; and 1,093 (8.2%) were age 55 or older.

The MSD population included 5,274 (39.4%) females and 7,116 (53.2%) individuals of minority backgrounds, with Black or African American accounting for 6,225 (87.5%) of minorities with MSD, those of Hispanic or Latino ethnicity accounting for 779 (10.9%), and individuals of Asian, Native American or American Indian, or Native Hawaiian or other Pacific Islander races accounting for 281 (3.9%) combined.

The services provided most for this population in PY 2018-19, as an indication of their rehabilitation service needs, were assessment and evaluation services, which were provided to 11,960 individuals with MSD (89.4%); supported employment services, which were provided to 2,950 (22.1%); job placement assistance, mostly through a community rehabilitation program, which was provided to 2,941 (22%); diagnosis and treatment of impairments, which was provided to 2,865 (21.4%); job search assistance, mainly by VR agency staff, which was provided to 2,187 (16.4%); counseling and guidance, which was provided to 1,756 (13.1%); transportation which was provided to 1,632 (12.2%); short term job supports, mostly as work adjustment job coaching, which was provided to 1,574 (11.8%); and maintenance, which was provided to 1,291(9.7%). Other services provided are listed in table J.1.

Table J.1. Services provided for Individuals with MSD, PY 2018-19

Service Type	Number of clients that received the service	Percent of MSD population served
Assessment	11,960	89.4%
Supported Employment Services	2,950	22.1%
Job Placement Assistance	2,941	22.0%

Service Type	Number of clients that received the service	Percent of MSD population served
Diagnosis and Treatment of Impairments	2,865	21.4%
Job Search Assistance	2,187	16.4%
Counseling and Guidance	1,756	13.1%
Transportation	1,632	12.2%
Short Term Job Supports	1,574	11.8%
Maintenance	1,291	9.7%
Job Readiness Training	794	5.9%
Literacy Training	597	4.5%
Benefits Counseling	456	3.4%
Information and Referral Services	304	2.3%
Vocational Training	272	2.0%
Rehabilitation Technology	212	1.6%
Miscellaneous Training	172	1.3%
Community College	171	1.3%
On-the-Job Training	166	1.2%
University Training	141	1.1%
Customized Employment Services	141	1.1%
Disability Related Skills Training	127	0.9%
Interpreter Services	92	0.7%
Customized Training	35	0.3%
Personal Assistance Services	26	0.2%
Graduate School Training	17	0.1%
Reader Services	10	0.1%
Extended Services	8	0.1%
Technical Assistance	< 5	< 0.1%
Apprenticeship Training	< 5	< 0.1%

In a survey of 671 rehabilitation professionals responses as to the needs of individuals with most significant disabilities were provided by 83.3% (n = 559) of the survey participants. Of the valid responses, 38.8% reported transportation; 25% reported CRP services, such as short-term job coaching, supported employment, and extended services; 8.1% wrote that more business engagement and employer services were needed; 7.7% responded that more maintenance and financial support was needed. A smaller percentage (< 5%) listed the following VR service needs: counseling and guidance, including benefits and financial literacy counseling, job search and job placement assistance, training services, and increased agency capacity and collaboration with other agencies and programs.

Minorities

Individuals who are of a minority race or ethnicity accounted for 52.8% (n = 22,836) of 43,255 eligible DVRS VR consumers served in PY 2018-19.

Within this population 31.2% (n = 7,124) were individuals with MSD; 60.7% (n = 13,866) were individuals with significant disabilities; and 8.1% (n = 1,846) did not have significant disabilities.

Regarding their primary disability, 0.4% (n = 93) had blindness or a visual impairment; 3.6% (n = 826) were deaf, hearing impaired or deaf-blind; 13.8% (n = 3,146) had a mobility, dexterity, or other orthopedic impairment; 12% (n = 2,155) had another type of physical impairment related to a medical condition; 35.2% (n = 8,030) had a cognitive impairment; and 8,000 (35%) had a psychosocial or other mental impairment.

Individuals of minority backgrounds ranged in age from 13 to 82, with 35 as the average and 32 as the median age. Of the 22,836 eligible VR consumers of minority backgrounds, 37.1% (n = 8,467) were transition age youth, younger than 25; 46.6% (n = 10,645) were ages 25 to 54; and 16.3% (n = 3,724) were ages 55 and older.

About 47.1% the individuals of minority backgrounds were female (n = 12,075).

The minority backgrounds of this population included 87.4% (n = 19,965) who were Black or African American; 10.8% (n = 2,475) who were Hispanic or Latino; 3.1% (n = 706) who were American Indian or Alaskan Native; 1.6% (n = 371) who were Asian; and 0.6% (n = 144) who were Native Hawaiian or other Pacific Islander.

The services provided most for this population in PY 2018-19 as an indication of their rehabilitation service needs, were assessment and evaluation services, which were provided to 20,437 individuals with MSD (89.8%); diagnosis and treatment of impairments, which was provided to 5,684 (25%); job search assistance, mainly by VR agency staff, which was provided to 4,789 (21.1%); job placement assistance, mostly through a community rehabilitation program, which was provided to 4,458 (19.6%); transportation which was provided to 3,234 (14.2%); short term job supports, mostly as work adjustment job coaching, which was provided to 3,086 (13.6%); counseling and guidance, which was provided to 2,962 (13%); maintenance, which was provided to 2,569 (11.3%); and supported employment services, which were provided to 1,842 (8.1%). Other services provided are listed in table J.2.

Table J.2. Services provided for Individuals of Minority Backgrounds, PY 2018-19

Service Type	Number of clients that received the service	Percent of minority population served
Assessment	20,437	89.5%
Diagnosis and Treatment of Impairments	5,684	24.9%
Job Search Assistance	4,789	21.0%
Job Placement Assistance	4,458	19.5%
Transportation	3,234	14.2%
Short Term Job Supports	3,086	13.5%
Counseling and Guidance	2,962	13.0%
Maintenance	2,569	11.2%
Supported Employment Services	1,842	8.1%
Job Readiness Training	1,278	5.6%
Vocational Training	847	3.7%
Benefits Counseling	768	3.4%
Literacy Training	663	2.9%
Information and Referral Services	617	2.7%
University Training	521	2.3%
Community College	490	2.1%
Rehabilitation Technology	427	1.9%

Service Type	Number of clients that received the service	Percent of minority population served
Interpreter Services	360	1.6%
Miscellaneous Training	306	1.3%
On-the-Job Training	298	1.3%
Disability Related Skills Training	126	0.6%
Customized Employment Services	90	0.4%
Graduate School Training	59	0.3%
Customized Training	37	0.2%
Reader Services	24	0.1%
Extended Services	16	0.1%
Personal Assistance Services	7	< 0.1%
Technical Assistance	< 5	< 0.1%
Apprenticeship Training	< 5	< 0.1%

From FFY 2017-2019 in a telephone survey of 1,740 VR clients of minority race or ethnicity who were unemployed, regarding their satisfaction with the VR program and barriers to employment, 59.8% reported they needed additional help with their job search; 49% said they needed additional VR services; 47.4% said they had medical problems that prevented them from working; 28% said they didn't have transportation; 23.6% said they weren't ready to work; 19.7% said they felt discriminated against because of their disability; 17.4% said there weren't any jobs available that they wanted; 17.3% said they feared losing their disability or healthcare benefits; and 6% said they didn't have childcare.

Unserved or underserved populations

There is no regulatory definition for individuals who have been unserved or underserved by the VR program. The federal guidance for establishing this category is that it can be defined from a comparison of the demographics of individuals served by the VR program with those of the population of individuals with disabilities residing in the state or from the results of a survey or key informant interviews.

The demographics of the population of the 43,255 eligible individuals served by the DSB VR program in PY 2018-19 are as follows:

Minority race and ethnicity: 52.8% (n = 22,836) were of a minority race or ethnicity, the distribution of which is described in the previous section.

Gender: 45.4% (n = 19,638) were female.

Age at the start of the program year: The age range was from 13 to 92. The average age was 35 and the median age was 31. 38.4% (n = 16,624) were transition-age youth younger than 25; 46.5% (n = 20,110) were adults ages 25 to 54; and 15.1% (n = 6,521) were adults ages 55 and older.

Significance of disability: 30.9% (n = 13,372) were individuals with MSD; 59.2% (n = 25,627) were individuals with a significant disability; and 9.8% (n = 4,256) were individuals whose disability was not significant.

Primary impairment: 0.3% (n = 151) had blindness or a visual impairment; 4% (n = 1,733) were deaf, hearing impaired, or deaf-blind; 14.2% (n = 1,526) had a mobility, dexterity, or other orthopedic impairment; 10.1% (n = 4,353) had a physical impairment other than orthopedic; 31% (n = 13,402) had a cognitive impairment; and 40.4% (n = 17,486) had a psychosocial or other mental impairment.

Comorbidity: 49.3%(n = 21,305) had a secondary disability, of which 0.4% (n = 95) had blindness or a visual impairment; 0.5% (n = 99) were deaf, hearing impaired, or deaf-blind; 7.3% (n = 1,526) had a mobility, dexterity, or other orthopedic impairment; 12.1% (n = 2,582) had a physical impairment other than orthopedic; 29.3% (n = 6,239) had a cognitive impairment; and 50.3% (n = 10,725) had a psychosocial or other mental impairment.

In a survey of 671 rehabilitation professionals specific populations of underserved individuals with disabilities were identified in 83.8% (n = 562) of the responses. These groups included people living in rural areas (17.1%); individuals with mental illness (13.2%); students with disabilities (10%); people without transportation (9.6%); homeless (8.5%); ethnic minorities, including people with cultural or language barriers (8.2%); individuals who are deaf or hard of hearing (5%); individuals with significant or most significant disabilities (4.8%); autism (4.4%) and fewer than 4% reported physical disabilities, ex-offenders, substance abuse, adults, elderly, TBI, uninsured, and veterans. Reponses on the needs of these populations varied, although transportation was mentioned in 27.4% of the valid responses. Other frequently reported needs included training programs, affordable housing, healthcare and mental health services, and outreach, community and employer awareness and education to increase employment opportunities.

Who have been served through other components of the statewide workforce development system

Over half the individuals served by the DVR VR program are also served through other components of the workforce development system. Over a 10-year period, from PY 2008-09 to PY 2017-18, the DVR VR program served 190,639 unique individuals, as reported to the NC Common Follow-up System, of which, at some point during the 10-year period, 58.8% (n = 112,189) had also received services through NCWorks Career Centers under the Title I Adult, Youth, or Dislocated Worker programs or Title III, Wagner-Peyser, including NCWorks Online.

In a survey of Workforce Development Board Directors from the Kerr-Tar, Western Piedmont, Capital Area, and Charlotte Works Workforce Development Board regions, as key informants, the rehabilitation needs of individuals with blindness and visual disabilities were identified as follows: More collaboration between VR and the Talent Employment Solutions Team at Career Centers when VR has determined that people are job ready; employment related service needs should be better advertised and success stories broadcasted to a wider audience; workforce partners have to do a better job of telling their story; individuals with disabilities, especially, need to know they can offer valuable skills to the workforce; individuals with disabilities struggle in some cases with an employer's lack of assistive technology or don't know how to request accommodations; individuals with disabilities may need to know how to answer interview questions concerning their abilities; other needs included job search assistance, including resumé preparation, employability workshops, advocacy training, assessments, interpreting services, psychological services, counseling services, and medical services for diagnostic or evaluation purposes.

Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services

Transition age youth, ages 14-24, comprise 41.4% (n = 20,784) of the 50,198 total individuals served by the DVRS VR program in PY 2018-19, including potentially eligible students with disabilities and individuals who applied for VR services but had not been determined eligible by the end of the program year. Within this youth population, 13,593 (65.4%) of the 20,784 transition-age youth were ages 14-21 at the start of the program year and were identified as students with disabilities at either application to the VR program or the start date of their pre-employment transition services, of which 2,567 (18.9%) were potentially eligible for VR services but had not applied.

About 80% of transition age youth served in PY 2018-19 had applied and were determined eligible for VR services (n = 16,623). Within this population, 40.6% (n = 6,754) were individuals with MSD, 50.4% (n = 8,381) had significant disabilities, and 9% (n =1,488) did not have significant disabilities; 37.1% (n = 6,160) were female and 50.7% (n = 8,427) were of a minority race or ethnicity, of which and 7.5% (n = 1,240) of Hispanic or Latino ethnicity.

The services provided most for transition-age youth in PY 2018-19 as an indication of their rehabilitation service needs are listed in table J.3.

Table J.3. VR Services provided for Transition-age Youth, PY 2018-19

Service Type	Number of clients that received the service	Percent of transition-age youth population served
Assessment	16,357	98.4%
Job Placement Assistance	2,793	16.8%
Job Search Assistance	2,282	13.7%
Counseling and Guidance	2,157	13.0%
Diagnosis and Treatment	2,066	12.4%
Short Term Job Supports	1,969	11.8%
Supported Employment Services	1,542	9.3%
Job Readiness Training	1,395	8.4%
Literacy Training	1,377	8.3%
Maintenance	1,161	7.0%
Transportation	1,003	6.0%
University Training	655	3.9%
Information and Referral Services	436	2.6%
Vocational Training	413	2.5%
Community College	410	2.5%
Miscellaneous Training	309	1.9%
On The Job Training	275	1.7%
Benefits Counseling	243	1.5%
Rehabilitation Technology	175	1.1%
Disability Related Skills Training	169	1.0%
Interpreter Services	158	1.0%
Customized Employment Services	134	0.8%
Customized Training	91	0.5%
Graduate School Training	53	0.3%
Reader Services	30	0.2%
Personal Assistance Services	24	0.1%

In a survey of rehabilitation professionals 70% (n = 470) of 671 survey participants identified one or more needs for transition-age youth. The need most frequently identified was job readiness training which was mentioned in 204 (43.4%) of the responses; 18% reported communication; 17% identified a need for transportation; and 15% identified a need for more job opportunities. Other themes regarding client needs

included training, transition services, pre-employment transition services, social development, more VR in schools, family support, SSI/SSDI, and assistive technology.

Identify the need to establish, develop, or improve community rehabilitation programs within the state

The Community Rehabilitation Programs (CRPs) directly provide or facilitate the provision of one or more VR services to individuals with disabilities as one of their major functions. The purpose of these services is to enable those individuals to maximize their opportunities for employment. DVRS extends its services for people with disabilities through partnerships with the CRPs. The CRPs provide one or more of the following services to people with disabilities to help them prepare for and obtain employment: community-based assessment, vocational evaluation, work-adjustment training, supported employment, and job coaching. Toward the start of the fiscal year with over 135 CRPs across the state and more than 7,800 VR participants received services from a CRP, of which approximately 39% received supported employment (SE) services. Of those provided CRP services that year, 2,804 achieved their employment objectives in the same year, including 1,110 individuals that were placed in employment in an integrated setting with supports, while many others continued to progress towards employment.

The CRPs have representation on a Steering Committee that includes agency staff and representatives from the NC DHHS Division of Mental Health, Developmental Disabilities, and Substance Abuse Services (MH/DD/SAS), and representatives from the CRP community appointed by the VR program, the NC Association of People Supporting Employment First (APSE), and the NC Association of Rehabilitation Facilities (NCARF). The steering committee meets on a quarterly basis and focuses on budgetary and program issues and makes recommendations. Needs for improving and expanding CRPs identified by the steering committee include review and ongoing revisions to rules and standards, including qualifications standards for CRP staff providing or supervising direct services to consumer, which were developed to address the need for service quality and uniformity; the development of a new evaluation instrument to assist with monitoring the quality of services being provided by CRPs, and also address the need for service quality and uniformity; the development of a website specific to CRP resources, such as vendor applications and rules and standards, which now includes a description of the process for becoming an approved vendor; an evaluation of fair rates and methods of compensation for CRPs and supporting activities such as transportation services provided to consumers, which addressed the need for fiscal responsibility in providing these services efficiently, yet fairly; and the development of effective collaborative efforts with the NC DHHS.

Division of Mental Health, Developmental Disabilities and Substance Abuse Services (DMHDDSAS) to provide consistent funding for extended supported employment addressed the need for VR Program participants to receive follow-along services, even after their case was successfully closed.

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

Transition age youth, ages 14-24, comprise 41.4% (n = 20,784) of the 50,198 total individuals served by the DVRS VR program in PY 2018-19, including potentially eligible students with disabilities and individuals who applied for VR services but had not been determined eligible by the end of the program year. Within this youth population, 13,593 (65.4%) of the 20,784 transition-age youth were ages 14-21 at the start of the program year and were identified as students with disabilities at either application to the VR program or the start date of their pre-employment transition services, of which 2,567 (18.9%) were potentially eligible for VR services but had not applied.

About 80% of transition age youth served in PY 2018-19 had applied and were determined eligible for VR services (n = 16,623). Within this population, 40.6% (n = 6,754) were individuals with MSD, 50.4% (n = 8,381) had significant disabilities, and 9% (n =1,488) did not have significant disabilities; 37.1% (n = 6,160) were female and 50.7% (n = 8,427) were of a minority race or ethnicity, of which and 7.5% (n = 1,240) of Hispanic or Latino ethnicity.

The services provided most for transition-age youth in PY 2018-19, as an indication of their rehabilitation service needs are listed in table J.3.

Table J.3. VR Services provided for Transition-age Youth, PY 2018-19

Service Type	Number of clients that received the service	Percent of transition-age youth population served
Assessment	16,357	98.4%
Job Placement Assistance	2,793	16.8%
Job Search Assistance	2,282	13.7%
Counseling and Guidance	2,157	13.0%
Diagnosis and Treatment	2,066	12.4%
Short Term Job Supports	1,969	11.8%
Supported Employment Services	1,542	9.3%
Job Readiness Training	1,395	8.4%
Literacy Training	1,377	8.3%
Maintenance	1,161	7.0%
Transportation	1,003	6.0%
University Training	655	3.9%
Information and Referral Services	436	2.6%
Vocational Training	413	2.5%
Community College	410	2.5%
Miscellaneous Training	309	1.9%
On The Job Training	275	1.7%
Benefits Counseling	243	1.5%
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In a survey of rehabilitation professionals 70% (n = 470) of 671 survey participants identified one or more needs for transition-age youth. The need most frequently identified was job readiness training, which was mentioned in 204 (43.4%) of the responses; 18% reported communication; 17% identified a need for transportation; and 15% identified a need for more job opportunities. Other themes regarding client needs

included training, transition services, pre-employment transition services, social development, more VR in schools, family support, SSI/SSDI, and assistive technology.

(k) **Annual estimates**

Describe:

The number of individuals in the state who are eligible for services:

The VR program projects an average of 41,000 individuals with a disability who have been determined eligible for VR services, exclusive of pre-employment transition services, will be in-service with the VR program in each of the program years, 2020 through 2024. This estimate includes: (a) cases where purchased services are provided in accordance with the consumer's individualized plan for employment; (b) cases where purchased services are provided toward the development of the consumer's individualized plan for employment (e.g., diagnostic and assessment services provided by a community rehabilitation program); and (c) cases where services are provided in-house by agency staff or as a comparable service or benefit.

The number of eligible individuals who will receive services under:

The VR program

Of this annual average population of 41,000 individuals eligible for VR services, the VR program projects 33,000 will be served under individualized plan for employment and 18,000 will receive direct cost services provided with funds under the basic support grant for PY 2020-2024.

The supported employment program

In PY 2018-19, VR program expenditures for supported employment services totaled over $6.2 million for 1,554 individuals at an average cost of $4,000 per case. The VR program projects average payments of $4,000 for 1,550 individuals with most significant disabilities each program year, 2020 through 2024, for a total of $6.2 million annually in supported employment services payments from Title I Part B (basic support grant).

Each priority category, if under an order of selection

DVRS does not expect to implement an order of selection process during federal fiscal years 2020-2024. Services will be available both years for all client service categories.

The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection:

The North Carolina VR Program is not currently under an order of selection and does not expect to be during federal fiscal years 2020-2024.

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:

For federal fiscal years 2020-2024, the VR program projects average annual expenditures of approximately $46 million for purchased services, exclusive of pre-employment transition services, for 18,000 individuals eligible for VR services. This averages to $2,556 per eligible individual for whom cost services will be provided, inclusive of supported employment services.

(l) **State goals and priorities**

The designated State unit must:

Identify if the goals and priorities were jointly developed

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 goals and priorities in this section were developed by the State VR agency in consultation with the State Rehabilitation Council. (placeholder pending SRC approval)

Identify the goals and priorities in carrying out the VR and supported employment programs.

Priority: Competitive integrated employment

Goal: Increase competitive integrated employment opportunities and outcomes for individuals with disabilities, particularly those with most significant disabilities, underserved populations, and individuals with additional barriers to employment.

Priority: Youth and students with disabilities

Goal: Increase opportunities for training and employment services for youth with disabilities.

Goal: Increase the provision of pre-employment transition services for students with disabilities.

Priority: Business engagement

Goal: Increase partnerships with businesses and government agencies to develop or expand work experiences, internships, and employment opportunities for adults and youth with disabilities.

Priority: Capacity building

Goal: Increase internal capacity and develop the program infrastructure needed to improve service delivery for VR participants and employers.

Goal: Increase collaboration with WIOA core and required program partners to integrate and expand services for individuals with disabilities.

Ensure that the goals and priorities are based on an analysis of the following areas:

The most recent comprehensive statewide assessment, including any updates

The goals and priorities were developed following an analysis of the most recent comprehensive statewide assessment survey and review of administrative data.

The state's performance under the performance accountability measures of section 116 of WIOA

The goals and priorities were developed to improve the state's performance under the performance and accountability measures.

Other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under Section 107.

The goals and priorities were developed to improve the operation and effectiveness of the VR program, especially with regard to improving employment outcomes for individuals with disabilities, increasing the provision of pre-employment transition services to youth, building internal agency capacity and collaboration with WIOA partner programs, and increasing business engagement.

(m) **Order of selection**

Describe:

Whether the designated state unit will implement and order of selection.

The North Carolina VR Programs are not under an order of selection, and the North Carolina designated state units do not plan to implement an Order of Selection during the period covered by the Unified State Plan.

If so, describe:

The order to be followed in selecting eligible individuals to be provided VR services

Not applicable.

The justification for the order.

Not applicable.

The service and outcome goals.

Not applicable.

The time within which these goals may be achieved for individuals in each priority category within the order.

Not applicable.

How individuals with the most significant disabilities are selected for services before all other individuals with disabilities.

Not applicable.

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.

The North Carolina VR Programs are not under an order of selection, and the North Carolina designated state units do not plan to implement an Order of Selection during the period covered by the Unified State Plan.

(n) **Goals and plans for distribution of Title VI funds.**

Specify the state's goals and priorities for funds received under Section 603 of the Rehabilitation Act for the provision of supported employment services.

Title VI, Part B funds were last received in FFY 2019. DVRS forecasts annual expenditures of approximately $7 million for supported employment services that will be provided through the Title I basic support grant.

Describe the activities to be conducted, with funds reserved pursuant to Section 603(d), for youth with the most significant disabilities

The provision of extended services for a period not to exceed 4 years

As incorporated into its policies concerning supported employment services, the NCDVRS VR program first provides ongoing support as appropriate for supported employment. Ongoing support includes services: (a) needed to support and maintain the individual in SE that are (b) based on a determination by the DVR counselor of the individual's needs as specified in an IPE; and (c) furnished from the time of job placement until transition to extended services, except as provided in post-employment status and following transition, by one or more extended service providers throughout the individual's term of employment in a particular job placement or multiple placements, if those placements are provided under a program of transitional employment.

At the time of transition to extended services from an extended services provider, the VR program ensures through its contracts, agreements, and policies that extended services are provided by a state agency, a private non-profit organization, through natural supports or any other appropriate resource other than VR,

after the individual has made the transition from the state VR support. Extended services begin when: (a) the individual is employed, (b) intensive training is completed, and (c) stabilization on the job has occurred. Individuals may be served for as long as there is a reasonable expectation that an extended services source will be identified during the course of rehabilitation. The NC DVRS VR Program will only contract with supported employment service providers that give written commitment that they will provide extended services compliant with Federal regulations.

Ongoing support provided during extended services must include a minimum of twice-monthly monitoring at the work site to assess job stability unless under special circumstances, especially at the request of the individual, the IPE provides for off-site monitoring and based upon that assessment, the coordination or provision of specific services at or away from the work site, that are needed to maintain employment stability. If off-site monitoring is determined to be appropriate, it must, at a minimum, consist of two face-to-face meetings with the client and one employer contact monthly. These activities apply to all supported employment clients and not only those whose services are provided through funds reserved pursuant to section 603(d), for youth with the most significant disabilities.

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.

The DVRS VR program is collaborating with community rehabilitation programs, other agencies and organizations to provide extended services and expanded supported employment opportunities for youth with the most significant disabilities. Because DVRS will only utilize community rehabilitation programs that give written commitment that they will provide extended services compliant with Federal regulations as supported employment vendors, many of those community rehabilitation programs providing SE services also provide extended services under their service contract at no additional cost to DVRS when other resources for extended services are not available. The Request for Application (RFA) is one of the key tools DVRS utilizes for contract and program development, in which the entity submitting the application has completed much of the foundational work in leveraging and braiding resources from other public and private funds. And, through its continued participation on interagency committees and collaboration efforts, DVRS will continue to work with community rehabilitation programs, LME/MCOs, and other organizations to leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

(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)):

The methods to be used to expand and improve services to individuals with disabilities.

The North Carolina Division of Vocational Rehabilitation Services (DVRS) is partnering with the Division of Mental Health, Developmental Disabilities, and Substance Abuse Services (DMHDDSAS) and other divisions and departments in developing competitive, integrated employment opportunities. DVRS establishes and maintains contracts or agreements with over 120 private for profit and non-profit VR service providers providing an array of services to DVRS consumers. One hundred two (102) private-nonprofit VR service providers have established performance-based contracts with the Division, where the organizations are administered funds when an individual receiving services within their program has achieved designated goals or "milestones" on their way toward their ultimate goal of competitive employment. Almost all supported employment and work adjustment services provided through community rehabilitation programs were transitioned from a fee for services hourly rate payment system to a milestone payment

system. Additionally, performance-based cooperative agreements engaging non-profit organizations encompass brain injury support services, multiple (currently 14) Project SEARCH™ sites and the provision of Pre Employment Transition Services. This system and its implementation were developed in collaboration with the community rehabilitation provider community through representation via the CRP-DVRS Steering Committee and other means of stakeholder input.

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.

Assistive technology services and devices are provided to eligible individuals statewide who require them. Rehabilitation technology and Assistive technology services are sponsored and provided to the degree necessary to complete the rehabilitation program. Included are services and devices which can supplement and enhance an individual's functions such as, adapted computer access, augmentative communication, specialized seating and mobility, vehicle modifications, and services which can have an impact on the environment, such as accessibility, job re-design, work site modification and residence modification. Application of the available engineering and Assistive technology services and technologies is important when making determinations of eligibility particularly for individuals with significant and most significant disabilities. Rehabilitation engineering evaluations and services are not subject to an individual's financial eligibility; however, devices, equipment and modifications recommended by the engineer are subject to financial eligibility. Applicants during the assessment phase, and consumers determined to be eligible for services in need of and who can benefit from rehabilitation engineering services, devices and Assistive technology services can be referred to providers of these services, and these services can assist with assessment processes. Presently within the state, these services are made available statewide by Rehabilitation Engineers, Assistive Technology Consultants, and other agency staff as well as through outside Assistive Technology Suppliers and Providers. The Division is fortunate to have the North Carolina Assistive Technology Program as a vital program component. The program increases access and the provision of services to individuals served within the VR program and supports the Division mission of increasing independence for clients in the home, post- secondary school and work setting. In addition, this affords clients of the Division with fast access to the programs array of services which includes: technical expertise in selecting the most appropriate device; hands-on demonstration and try-out of low tech and high tech devices for people with disabilities; information on a variety of technology options; funding resource information and strategies; short-term loan of equipment to consumers, families and professionals who serve them; training to consumers, families and professionals; technical assistance to local organizations, schools, and programs to expand Assistive technology local service delivery capacity; awareness and outreach activities to inform the public about equipment and devices people with disabilities can use for greater independence. DVRS collaborated with the North Carolina Assistive Technology Program (NCATP) to purchase iPads to train DVRS and community rehabilitation program (CRP) field staff in the use of technology to overcome specific barriers to employment. Staff learned different software applications (apps) as well as different ways to communicate to employers during job development. A team member from the Employment and Program Development Section will present at the National TASH Conference in Portland, Oregon in December 2015 where NC's project with the iPads will be highlighted. NCATP provides a professional development program available to all VR staff who provide evaluation, Assistive technology equipment and Assistive technology services for the consumers they are serving. NCATP has nineteen staff serving the state of North Carolina, which includes the Director, AT Information/ Referral /Funding Specialist, Intake Coordinator, Inventory Specialist, 1 AT Re-use Special Projects Assistant, 4 Speech Language Pathologists (SLP) and 8 Assistive Technology Consultants. The 8 AT Consultants and 4 SLPs provide direct one-on-one services in the Assistive Technology Centers.

Since 2015 DVRS has progressively increased their collaborative efforts with NCATP and other Ability partners to provide assistive technologies and related services to farmers and farmworkers within the

state. There have also been joint outreach efforts to Veterans with disabilities who may be interested in pursuing agriculturally-oriented occupations.

Additionally, the current interagency agreement between DVRS and education agencies, including the DPI and Local Educational Agencies (LEA)/School Boards, stipulate the financial responsibilities of education agencies, which include the provision of assistive technology required and included in an individual's IEP, without cost to the DVRS. Both DVRS and DSB share information about technical assistance and consultation to DPI, LEAs, and schools regarding accommodations and assistive technology that will help facilitate the education and vocational rehabilitation of students with disabilities, including students who are deaf or hearing impaired, blind, deaf-blind, or visually impaired.

> 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.

DVRS employs several strategies to increase outreach activities to various minority groups with the goal of also reaching those individuals with the most significant disabilities. The major thrust of activities is to go where the minority individuals and groups are; contrasted with expecting them to come to Vocational Rehabilitation or to know how to access services without assistance. Management and staff on the local, regional, and state levels continue to identify minority or ethnic groups in their community along with identifying group leaders, common meeting places, and preferred ways to access information, and also neighborhood and community resources that can be used and developed to bring rehabilitation services to more minority individuals with the most significant disabilities. As there are numerous diverse cultures throughout North Carolina, Staff are encouraged to concentrate on the groups in their area. The specific groups of considerable interest include: North Carolina Native Americans, Hispanic/Latino populations and African and Asian populations. The Division has created a staff position that is dedicated to developing and furthering initiatives for outreach to Hispanic/Latino populations. This individual routinely travels to the communities where there are high concentrations of the targeted populations and provides marketing information to their meetings and carnivals. The Division also has active program specialists who provide outreach to advocacy organizations serving individuals in the following areas: Mental Illness and Substance abuse, Veterans, Developmental Disabilities, Traumatic Brain Injuries, and Deaf/Communication Disorders. Specific objectives and strategies pertaining to these activities are included within the State Plan Goals.

DVRS, in partnership with DSB, piloted a staff development initiative that will continue for the PY 2020-24 planning cycle: Project E3: Educate, Empower, and Employ. Project E3 includes intensive technical assistance to build program capacity for state VR programs, with a focus on improving engagement and successful outcomes of individuals with disabilities experiencing intergenerational poverty. In late 2017, Project E3 staff initiated in-person trainings and tools to increase VR participation in two economically disadvantaged North Carolina communities. The programmatic intervention included community-based participatory research to identify key issues and challenges, map existing resources, and confirm commitment from providers and other stakeholders. Subsequent intervention strategies included implementation of an in-reach/outreach strategy for youth SSI recipients, applicants, and their families regarding VR services; the alignment of work incentives benefits counseling with financial literacy and empowerment coaching; and staff development training in evidence-based employment practices, including motivational interviewing and trauma-informed care.

> 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)

DVRS revised its state level memorandum of agreement with DPI upon issuance of the final federal regulations on Title IV of WIOA. The purpose of the agreement is to outline a collaborative partnership

between the two agencies to provide state level approval and support for enhanced transition services to students with disabilities. The revised agreement with DPI will also specify the manner in which pre-employment transition services will be coordinated and provided within NC schools as well as how students with disabilities, including those who are potentially eligible for VR services, will be identified and served in compliance with federal regulations. In addition to a state level memorandum of agreement, the DVRS VR unit offices and local education agencies (LEA) customize a local Third-Party Cooperative Agreement (TPCA) to outline how the agencies will work together to ensure that VR services are administered to students with disabilities. The TPCA stipulates administrative funding to support VR staff, outlines procedures for information sharing, and requires a process for referring students with disabilities to VR for the Division to carry out the VR process. DVRS TPCAs with 99 of the 115 LEAs in North Carolina contribute funding towards 202 positions including VR counselors, business relations representatives, vocational evaluators and additional VR support staff including casework assistants and casework technicians available to provide VR transition services in the local community. In areas where a TPCA has not been established, the local manager has designated a VR counselor to directly serve the students with disabilities in the local schools. Since 2003, DVRS has implemented strategies for serve transition-aged youth and will continue to enhance programs and services to transition-aged youth with increased focus on students with disabilities and pre-employment transition services. New programs are intended to align the Division with federal requirements under the Workforce Innovation and Opportunity Act, namely pre-employment transition services, as well as provide improved transition services to students while they are in high school. DVRS expects that NC public schools will see a value-add for investing in the VR partnership. DVRS plans to maintain and strengthen its programmatic relationships with school transition services through its continued active participation by the Division's Transition Program Specialist on the State Capacity Building Team for Transition. This team, including DPI leadership, DVRS, University Center for Development and Learning, Parent/Child Advocacy Agency, Career and Technical Education, and NC Community Colleges System representation was formed in recent years to develop statewide goals and provide better coordinated transition activities for students with disabilities to achieve better results with post-school outcomes, including obtaining employment or attending post-secondary education. Currently, NC's Capacity Building Plan is focused on improving student involvement in the individualized education program (IEP) process so that planning is more meaningful and associated with a student's post-school goals. The state is continuing to work on a Transition Toolkit for teachers and anticipates the development of toolkits for parents, students, and agencies that will be individualized at the local level. DPI consultants are providing transition training to LEAs to promote student-led IEPs. DVRS plans to continue collaboration with DPI leadership on technical assistance grants that focus on improving transition services and employment outcomes for transition aged youth.

<u>If applicable, plans for establishing, developing, or improving community rehabilitation programs within the state.</u>

DVRS continues to utilize two advisory workgroups or committees comprised of supported employment, other community rehabilitation program providers along with Division staff as an effective method to identify and update the needs, goals, and priorities as they pertain to community rehabilitation programs. This group annually establishes goals and makes recommendations to the DVRS Director regarding the directions in which the community rehabilitation programs should continue to develop and grow. Another venue that has effectively promoted healthy dialog between the community rehabilitation programs and the Division is the regional CRP summit. Typically, annually or semi-annually, as funding permits, regional summits are held where training and discussion of topics of mutual interest to both the CRP community and the Division. Community rehabilitation programs are evaluated annually by the Division's local, Regional, and State management in order to determine the appropriate level of service outcomes for purchase for the next funding cycle. The decision is based primarily upon need of consumers and availability of financial resources. The programs are also evaluated annually by the Division's local, Regional, and State management relative to program capital and staffing needs for new and innovative

programs. Priorities are developed and many of these needs are met through the Establishment Authority (the authority which makes funds available for the establishment of community rehabilitation programs) contingent upon the Division having funds available to do so. The need for new community rehabilitation programs is also assessed continually, with special emphasis as part of the comprehensive statewide needs assessment process. New community rehabilitation programs are created, at least in part, to assist the Division in meeting identified needs and are typically generated through local and sometimes legislative initiatives. In these cases, the Division can help expand and improve the programs through establishment projects as funds permit. One important activity DVRS and DSB initiated that will launch during the PY 2020-2024 planning cycle is the migration to a Geographic Solutions case management system, which will facilitate data sharing across WIOA partners and improve case management and reporting.

Strategies to improve the performance of the state with respect to the performance accountability measures under section 116 of WIOA.

DVRS and DSB are entering the baseline year for the performance accountability measures under section 116 of the Workforce Innovation and Opportunity Act. The Divisions realize that to improve performance on the indicator concerning median quarterly earnings, they must help consumers to prepare higher paying positions through credential attainment and measurable skills gains. DVRS and DSB are currently looking for ways to adjust programs, services, and support to accomplish this in a fiscally- responsible manner. Further, DVRS commitment to increasing client earnings is reflected in the elevated standing of importance that obtaining quality jobs for its consumers has and has made pursuit of this goal/priority 1. Employment Outcomes: Increase quantity and quality of employment outcomes of individuals with disabilities, particularly individuals with significant/most significant disabilities through a dual customer approach. Beyond increasing consumers' participation in career-oriented post-secondary education/training, some of the other strategies that DVRS has established under this goal are to develop and build quality relationships with businesses that offer strong salaries and benefits and to continue offering the internship services, which, compared to an OJT experience, are geared more toward individuals who have completed their specialized training and need work experience to get their careers established. This service has been very well received by staff and consumers and we expect to continue the service. Another strategy that DVRS is employing is to increase the earning potential of individuals who have entrepreneurial skills through the support the Division has made available through a dedicated Small Business Specialist on staff who helps support staff and consumers in their assessment of this option as a fit and when it is mutually determined as such, coordination of local resources and ongoing supports for the consumer pursuing this option. In 2013, DVRS participated in a NIDRR-funded Learning Collaborative administered by the Institute for Community Inclusion. DVRS submitted a proposal to focus on strategies that can be employed to increase the average hourly wage in two offices within the Western region with different economic climates and resources. Asheville, which is the larger economic environment, will employ different strategies and approaches to the Forest City office, which is largely manufacturing-based and rural. The project concluded in February 2014, and successful strategies were reviewed to determine whether they may have application to other economic areas in North Carolina.

In March 2017, DVRS and DSB jointly entered an intensive technical assistance agreement with WINTAC to receive technical assistance with implementation and performance enhancement in the areas of the provision of pre-employment transition services , Customized Employment and related services; Extend the provision of services to unreached youth with disabilities in Juvenile Development Centers; linking individual staff performance with corporately collected Common Performance Measures; and Improving systems integration with the NCWorks Career Centers across the state.

Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities

DVRS has relatively strong ties with other components of the statewide Workforce Development System. The partnerships and linkages that were established prior to the provisions of the Rehabilitation Act amendments of 1998 have served as a stable and effective foundation for effective service delivery. Cooperative agreements or memorandum of agreements have been established with all local area workforce boards. The agreements provide for the following strategies: Provision of inter-component staff training and technical assistance regarding: the availability and benefits of, and information on eligibility standards for VR services; and the promotion of equal, effective, and meaningful participation by individuals with disabilities receiving workforce development system services in all of the states NCWorks Career Centers in the state through the promotion of accessibility; the use of non-discriminatory policies and procedures; the provision of reasonable accommodations; auxiliary aids and services, and rehabilitation technology for persons with disabilities. Identification of service delivery strategies by DVRS within the NCWorks Career Centers and other components of the workforce development system. Development and implementation of information systems that link all components of the statewide workforce development system; that link the components to other electronic networks including non-visual electronic networks; and that relate to such subjects as employment statistics and information on job vacancies, career planning, and workforce development activities. Further development and use of customer service features such as common intake and referral procedures when feasible, customer databases, resource information, and human services hotlines. Establishment of cooperative efforts with employers to facilitate job placement and carry out any other activities that Vocational Rehabilitation and the employers determine to be appropriate. Identification of staff roles, responsibilities, and available resources, along with specification of the financial responsibility of each component of the statewide workforce development system with regards to paying for certain services (consistent with state law and federal requirements). The rehabilitation needs of individuals who are served through components of the statewide workforce development system other than through the public VR program will be updated and reassessed through the methodology outlined in that section of the VR portion of the Unified State Plan. One of the ongoing goals for both the VR and NCWorks system is to continue to refine the processes and procedures for NCWorks Career Center staff to better determine which consumers with disabilities utilizing the centers should be referred to DVRS rather than being served through the NCWorks Career Centers. First it is necessary to determine which consumers served by the NCWorks system have a disability. Strategies to improve this will be further explored via mutual collaboration between the Division and NCWorks Career Centers to establish training for its staff. DVRS participated in the development of NCWorks Career Centers and continues to be an active partner throughout North Carolina to ensure that persons with disabilities are able to access core workforce services. Vocational Rehabilitation staff are represented on the state level as well as on local boards. The Division remains an active partner with the workforce development system and supports the NCWorks concept to provide more universal access to placement and training services; to integrate programs by offering a common core of information and services; and by offering consumers more choices regarding where and how they get services. Through local agreements, direct service delivery staff within the Division have gained more access to comprehensive DES data, which enables faster service delivery and cross-agency collaboration. Nearly all DVRS offices have obtained access to these databases to date. In every community where there are NCWorks Career Centers, local VR offices provide counseling staff, vocational evaluators, human resource placement specialists and other staff as appropriate to meet the needs of those individuals who enter a NCWorks Career Center and require the specialized services offered by the VR program. Specific arrangements and staffing patterns by VR staff vary from site to site depending on local needs and agreements. Enhanced working relationships with key partners of the workforce development system such as DSS, NCCCS, and other local partnerships allow all the agencies to better meet the needs of the individual. The number of individuals served or identified through components of the workforce

development system is increasing. Local Division management represents Vocational Rehabilitation on the Local Workforce Development Boards while staff also actively participate in planning, development, and service delivery with both individual component agencies or within the NCWorks Career Centers already established. State Level meetings with identified partners of the workforce development system continue to promote effective collaboration and equal access to services by individuals with disabilities.

How the agency's strategies will be used

To achieve goals and priorities by the state, consistent with the comprehensive needs assessment

Need to relate strategies with goals here.

Support innovation and expansion activities

Innovation and expansion funds were used in 2019 as a partnership contribution to NCCareers.org, North Carolina's career information website application. A portion of innovation and expansion funding will be used in support of activities of the NC DVRS state rehabilitation council.

Overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the state VR services program and the state supported employment services program.

The strategies listed in part (B) of this section specific to improving employment outcomes for individuals who have most significant disabilities and additional barriers to employment will be applied as strategies to 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. Strategies specific to overcoming identified barriers relating to equitable access to and participation of individuals with most significant disabilities in Supported Employment include continued collaboration with DMHDDSAS to (a) optimize coordination of services at the local service level to improve ease of service access for consumers requiring supported employment services; (b) expand implementation of the Individual Placement and Support Model of Supported Employment; (c) develop a funding mechanism that utilizes supported employment funds from VR, state funds from the Local Management Entities, and Medicaid dollars from the Managed Care Organizations to fund supported employment for those needing the individual placement and support (IPS) model of supported employment; (d) train VR field staff as well as Community Rehabilitation Program providers in the IPS Model of Supported Employment; (e) conduct fidelity reviews of providers who contract to provide the IPS Model of Supported Employment; and (f) increase the number of sites across the state to be a part of the IPS Model of Supported Employment.

(p) **Evaluation and reports of progress: VR and supported employment goals**

Describe:

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

Identify the strategies that contributed to the achievement of the goals.

Priority 1: Improve Client Outcomes

Goal 1.1. Increase the number and proportion of individuals exiting the VR program in employment after services were provided under an individualized plan for employment.

Measurable Objectives for Goal 1.1	FY 17	FY 18	FY 19
Objective 1.1.1. The number of persons achieving employment outcomes will equal or exceed the previous year.	5,339	5,022	4,721
Objective 1.1.2. The percentage of all individuals who have achieved an employment outcome after exiting the program having received services will equal or exceed 55.8%.	42.4%	50.2%	44.6%

Goal 1.2. Increase the number and proportion of individuals with significant or most significant disabilities exiting the VR program in employment after services were provided under an individualized plan for employment.

Measurable Objective for Goal 1.2	FY 17	FY 18	FY 19
Objective 1.2.1. At least 75% of VR consumers who achieved competitive employment will be individuals with significant or most significant disabilities.	86.5%	88.3%	89.4%

Goal 1.3. Increase earnings for individuals exiting the VR program in employment.

Measurable Objectives for Goal 1.3	FY 17	FY 18	FY 19
Objective 1.3.1. Increase average hourly earnings for individuals who exit the VR program in competitive employment from 48% the statewide average for all North Carolinians in federal fiscal year 2013 to at least 52% in program year 2019.	41.6%	41.6%	42.1%
Objective 1.3.2. Increase the proportion of clients exiting the VR Program in competitive employment whose own income is their primary source of support at closure compared to the percentage whose own income is the primary source of support when they applied for VR services from 62.7% in federal fiscal year 2013 to at least 65% in program year 2019.	62.5%	58.8%	58.2%

Performance Assessment

Objective 1.1.1. The number of individuals exiting VR in employment has decreased year-over-year since the implementation of the 2016-2020 Unified State Plan. This is due in part to a smaller total VR caseload.

From FY 2017 to 2019, the total VR caseload of individuals served decreased 11%, from 53,017 to 46,830. During the same period, employment outcomes decreased 9.8%, from 5,339 to 4,721.

Objective 1.1.2. The rehabilitation rate has averaged 45.7% for the past three years and has not met the former federal standard of 55.8% since FY 2014, the year when WIOA was enacted. Although the Division considers employment rate at case closure a meaningful measure of program success, the emphasis has been on the provision of quality services that help individuals leave the VR program with increased work opportunities, even if their case closes without an employment outcome. This is evidenced in the post-exit employment rate where, in 2018, 62% of exiters were employed in the second post-exit quarter. The VR program will continue help individuals increase their ability to find or maintain work post-exit and will evaluate the employment rate at the second and fourth post-exit quarter for the PY 2020-2024 WIOA Unified State Plan.

Objective 1.2.1. An increasing proportion of individuals exiting in employment have significant or most significant disabilities, from 86.5% in FY 2017 to 89.4% in 2019. This trend may be due in some part to historically low unemployment rates that provide increased opportunities for individuals whose disabilities are not significant impediments to employment. The VR program has expanded its contracts with community rehabilitation programs to provide services targeted to individuals with significant or most significant disabilities, including brain injury support services, community-based work adjustment, and individual placement and supports.

Objective 1.3.1. The VR program has yet to meet the former federal standard having VR exiters in competitive integrated employment earn at least 52% the state average hourly wage. The ratio for each of the past three years was about 42%. The average hourly wage was $9.70 for VR exiters and $23.33 for the state in FY 2017. This increased in FY 2018 to $10.04 for VR exiters and $24.11 for the state, and, again, in FY 2019 to $10.36 for VR exiters and $24.61 for the state.

Objective 1.3.2. Although the VR program exceeded the former federal standard of 53% in each of the three past fiscal years for the proportion of clients exiting the VR Program in competitive employment whose own income is their primary source of support at closure compared to the percentage whose own income is the primary source of support when they applied for VR services, the objective of at least 65% by 2019 was not achieved. In FY 2017, of the 5,339 exiters with an employment outcome, 74.8% had their own income as their primary source of support and 12.3% were retention cases where the individual was employed at the time of application with their own earnings as their primary source. The remaining 62.5% were primarily dependent on another source of income, such as public support or family and friends. This latter group moved towards self-sufficiency at the time of case closure and had reduced dependence on other sources of support to where they primarily depended on their own earnings. In FY 2018, 71.5% had their own income as their primary source of support at exit and 12.8% were retention cases, a difference of 58.8%. In FY 2019, 71.5% had their own income as their primary source of support at exit and 13.4% were retention cases, leaving a difference of 58.2%.

The VR program continues in its commitment to helping individuals with disabilities maintain and advance in employment during a period of historically low unemployment. Although the VR program is serving a larger proportion of individuals with significant or most significant disabilities who depend on public assistance and family and friends for support, it maintains its commitment to helping such individuals work towards increasing their economic independence. The NC Division of VR Services has expanded its contracts with community rehabilitation programs for training and job supports. Placements through community rehabilitation programs account for approximately half of the VR clients who exited in employment. There has also been an added emphasis on the provision of vocational counseling and guidance, benefits counseling, rehabilitation services, and matching employers' workforce needs with the skillsets of VR consumers. The VR program has increased placements for on-the-job training and internships and expanded brain injury support services, community-based work adjustment, and

individual placement and support (IPS) services. Other strategies employed to improve performance are summarized in more detail in the strategies section of the Unified State Plan.

Priority 2: Improve Outcomes for Minorities and Populations Identified as Underserved or Hard to Place in Employment

Goal 2.1. Increase the number and proportion of individuals with mental illness and substance abuse disorder exiting the VR program in employment after services were provided under an individualized plan for employment.

Measurable Objectives for Goal 2.1	FY 17	FY 18	FY 19
Objective 2.1.1. The total number of individuals with mental illness exiting the VR program in employment will exceed that of the prior year.	1,999	1,880	1,835
Objective 2.1.2. Increase the rehabilitation rate for individuals with mental illness exiting the VR program after receiving services under and individualized plan for employment from 47.7% in federal fiscal year 2013 to 52% in program year 2019.	37.6%	44.7%	41.0%

Goal 2.2. Increase the number and proportion of individuals with most significant disabilities exiting the VR program in employment after services were provided under an individualized plan for employment.

Measurable Objectives for Goal 2.2	FY 17	FY 18	FY 19
Objective 2.2.1. The total number of individuals with most significant disabilities exiting the VR program in employment will exceed that of the prior year.	1,757	1,729	1,759
Objective 2.2.2. Increase the rehabilitation rate for individuals with most significant disabilities exiting the VR program after receiving services under and individualized plan for employment from 44.8% in federal fiscal year 2013 to 50% in program year 2019.	44.0%	49.8%	47.3%

Goal 2.3. Increase the number and proportion of individuals with disabilities of minority racial backgrounds exiting the VR program in employment after services were provided under an individualized plan for employment.

Measurable Objectives for Goal 2.3	FY 17	FY 18	FY 19
Objective 2.3.1. The total number of individuals with disabilities of minority racial backgrounds exiting the VR program in employment will exceed that of the prior year.	2,736	2,561	2,392
Objective 2.3.2. Increase the rehabilitation rate for individuals with disabilities of minority racial backgrounds exiting the VR program after receiving services under and individualized plan for employment from 50.1% in federal fiscal year 2013 to 55.8% in program year 2019.	40.5%	49.7%	43.0%

Goal 2.4. Increase the number and proportion of individuals with disabilities who are ex-offenders exiting the VR program in employment after services were provided under an individualized plan for employment.

Measurable Objectives for Goal 2.4	FY 17	FY 18	FY 19
Objective 2.4.1. The total number of individuals with disabilities who are ex-offenders exiting the VR program in employment will exceed that of the prior year.	1,346	1,222	1,156
Objective 2.4.2. Increase the rehabilitation rate for individuals with disabilities who are ex-offenders exiting the VR program after receiving services under and individualized plan for employment from 47% in federal fiscal year 2013 to 52% in program year 2019.	37.4%	43.2%	38.0%

Performance Assessment

Objectives for Goal 2.1: For FY 2017-19, individuals with mental illness have accounted for 38% of all employment outcomes. Success in this area is largely attributed to expanded use of community rehabilitation programs through the milestone system and collaborative interagency efforts, including those that specifically target this population such as the individual placement and supports model of supported employment.

Objectives for Goal 2.2: Individuals with most significant disabilities have comprised an increasing proportion of the employment outcomes, from 32.9% in FY 2017 to 37.3% in FY 2019. About 53% of these exiters are individuals with intellectual disabilities and 40% are individuals with severe- or severe and persistent mental illness. Half are individuals of minority backgrounds, and 43% are transition-age youth at the time of exit. Success in this area is largely attributed to a focus on services for transition-age youth with I/DD and expanded use of community rehabilitation programs through the milestone system, and collaborative interagency efforts, including those that specifically target this population.

Objectives for Goal 2.3: For FY 2017-19, individuals of minority backgrounds accounted 51% of all employment outcomes. Success in this area is largely attributed to outreach in underserved areas and the application of a financial needs test for certain direct cost services. This allows the Division to provide these services to individuals, often of minority backgrounds who can least afford them.

Objectives for Goal 2.4: For FY 2017-19, approximately one of every four individuals who exited VR in employment was an ex-offender. Individuals with arrest records and misdemeanor convictions account for about two-thirds of this population. Convicted felons accounted for about a third of ex-offenders exiting in employment and 8.3% of all employment outcomes. Success in this area is attributed to job placement and job search assistance, employer engagement, and partnerships with corrections agencies in transitioning such individuals on parole and probation into the workforce.

Priority 3: Increase Client Satisfaction

Goal 3. Increase client satisfaction with the VR program, their counselor, and other staff.

Measurable Objectives for Goal 3	FY 17	FY 18	FY 19
Objective 3.1. Increase the percent of clients who are satisfied that they were treated by VR staff with courtesy and respect.	96.5%	95.6%	95.9%
Objective 3.2. Increase the percent of clients who are satisfied with the help they received from VR to decide on job choices.	83.8%	85.7%	82.2%
Objective 3.3. Increase the percent of clients who are satisfied with VR identifying their service needs towards becoming employed.	88.2%	90.3%	88.2%

Measurable Objectives for Goal 3	FY 17	FY 18	FY 19
Objective 3.4. Increase the percent of clients who are satisfied with the time it took to develop their individualized plan for employment.	88.8%	88.5%	88.4%
Objective 3.5. Increase the percent of clients who are, overall, satisfied with their experience with the VR program.	88.2%	88.4%	87.2%

Performance Assessment

For FY 2017-19, the percentages on the measures of customer satisfaction were consistently above 85% for all measures except the item on the client's satisfaction with help deciding on job choices, which was 82% for FY 2019 and averaged 84% for the three-year period. For all the other objectives under Goal 3, there was no statistically significant difference in the past three-years given the margin of error for the survey. Approximately 96% were satisfied they were treated by VR staff with courtesy and respect; 89% were satisfied with VR identifying their service needs towards becoming employed; 87% were satisfied with the time it took to develop their individualized plan for employment; and 88%. Were satisfied with their overall experience with the VR program. The high level of satisfaction experienced by VR participants is attributed to low staff vacancy rates, increased client contact, and a heightened focus on case service quality.

Describe the factors that impeded the achievement of the goals and priorities

Regarding the objectives based on increases in the raw number of exiters with employment outcomes (i.e., Objectives 1.1.1., 2.1.1., 2.2.1., 2.3.1., and 2.4.1.), there has been decrease in VR program applications and a smaller overall total caseload. Applications declined year-over-year from 20,714 in FY 2014 to 17,729 in FY 2019, a decrease of 14.4%. During this period, the VR caseload of individuals served under an individualized plan for employment decreased year-over-year from 44,399 in FY 2014 to 34,194 in FY 2019, a decrease of 23%. The decrease in VR applicants and caseload size is a national trend associated with an improved post-recession economy and tightening job market that is more favorable for individuals with disabilities.

The challenges in meeting the objectives on increasing the rehabilitation rate for exiters, overall, and for specific populations (i.e., Objectives 1.1.2., 2.1.2., 2.2.2., 2.3.2., and 2.4.2.) include a high number of case closures on unsuccessful cases that should have been closed in a prior year but weren't due to vacancies and staff retention issues in some areas. In times when staff vacancies are high, counselors prioritize services for their viable cases and the cases where they've lost contact with the client take longer to close. For the past three years, the average time from application to exit was about 24 months for employment outcomes and 40 to 44 months for unsuccessful closures. Another challenge is that as total caseload decreased in size, the cases become increasingly individuals with the most significant disabilities, multiple impediments, and other barriers to employment.

Regarding Objective 1.3.1., to increase average hourly earnings for individuals who exit the VR program in competitive employment to 52% the state average, the challenges include differences in the populations. About a third of VR exiters with employment outcomes are transition age youth who most typically exit the VR program in entry-level jobs. Nearly a fifth of exiters are individuals with the most significant disabilities who receive long-term vocational supports and have earnings that are closer to minimum wage. Additionally, nearly a third of exiters with employment outcomes are ex-offenders, including an average 11% that are convicted felons whose opportunities for higher wage employment may be limited by their offender status. The VR program will continue to sponsor and promote training for credential attainment

and measurable skill gains and provide job search and placement assistances to help individuals with disabilities obtain and advance in higher paying jobs.

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

Identify the strategies that contributed to the achievement of the supported employment goals and strategies

The VR program did not establish goals specific to the Title VI, Part B funds for the PY 2018 Unified State Plan update because, at the time the plan was submitted, North Carolina had not received any funds for FFY 2018 under Section 603 of the Rehabilitation Act for the provision of supported employment services. Although funds were delayed, the VR program since received $531,000 for FY 2018 and $525,000 for FY 2019. The Title IV, Part B funds were integrated with funding from the Title I Basic Support grant and state matching funds to purchase over $6.2 million in supported employment services for 1,554 individuals in PY 2018, not including assessment services. That year, 895 individuals exited VR in competitive integrated employment with supports, which accounted for 19% of all employment outcomes.

Describe the factors that impeded the achievement of the goals and priorities

Individuals exiting the VR program in competitive integrated employments with supports accounted for nearly a fifth of the total employment outcomes in PY 2018. This success is largely attributed to an emphasis on serving individuals with the most significant disabilities and the expansion of community rehabilitation program services. However, one of the key challenges is in the implementation of the Individual Placement and Supports (IPS) model of supported employment. The VR program has made substantial progress in identifying individuals that would benefit from IPS and in working collaboratively with state and local partner agencies, as described in Section (f) of the General VR Portion of the Unified Plan.

The VR Program's performance on the performance accountability indicators under Section 116 of WIOA.

Indicators of Performance	PY 18
The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program	62%
The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program	N/A*
The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program	$2,923
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	N/A*
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	35%

*Not required for the ETA-9169 annual performance report for PY 2018

How the funds reserved for Innovation and Expansion activities were utilized

In PY 2017 and 2018, innovation and expansion funds were applied towards infrastructure and cost-sharing for NCWorks Career Centers. Approximately $316,000 from the general VR program was allotted to the Workforce Development Boards according to the proportion of VR clients served under an

individualized plan for employment by the Title I and Title III programs. The infrastructure and cost-sharing agreement contributed to the support of the NCWorks Career Centers for the delivery of staff-assisted and independently accessed services, such as through NCWorks Online.

(q) **Quality, scope, and extent of supported employment services**

Include the following:

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 North Carolina Division of Vocational Rehabilitation Services in cooperation with the Division of Mental Health, Developmental Disabilities, and Substance Abuse Services, provided grant funding in 1985 to 6 service providers in North Carolina to implement supported employment services. In 1986 the Division was awarded funding from the Office of Special Education and Rehabilitation Services to create a systems-change approach to implementing supported employment services in North Carolina. Since 1987 the Division's effort has grown to a statewide system of approximately 118 supported employment programs. During federal fiscal year 2017, nearly 3,000 individuals received supported employment services and 1,530 of these individuals achieved a successful employment outcome. Supported employment providers receive vendorship funding through the utilization of Title VI, Part B funds and General services fund (110). Title VI, Part B funds will continue to be utilized to supplement funds under Part B of Title I for the cost of supported employment services to persons with the most significant disabilities. However, the extent of services offered to a particular individual is determined on an individual basis incorporating the individual's informed choice pertaining to their need to achieve and to maintain a vocational goal. Examples of populations that will be served include (but are not limited to) individuals with severe and persistent mental illness, significant cognitive impairments, cerebral palsy, autism, and traumatic head injury. Supported employment services will be provided on a time-limited basis to individuals with the most significant disabilities. These services may include, but are not limited to, the following:

- development of and placement in jobs based on client informed choice in an integrated setting for the maximum number of hours possible based on the unique strengths, resources, interests, concerns, abilities, and capabilities of individuals with the most significant disabilities;
- intensive on-site job skills training and other training provided by skilled job trainers, co-workers, and other qualified individuals, including fading and stabilization;
- extended follow along services, including regular contact with employers, trainees, parents, guardians, or other suitable professional and informed advisors, in order to reinforce and stabilize the job placement; and
- post-employment services may be funded under Title I of the Act following the individual's transition to extended services if the required services are unavailable from the extended service providers and if they are necessary to maintain the job placement.

The timing of transition to extended services

Under federal regulations, the time-limited VR supported employment services to be provided are not to exceed 24 months funding unless the individualized plan for employment indicates that more than 18 months of services is necessary in order for the individual to achieve job stability prior to transition to extended services. The transition process from VR services to the extended service phase begins during the stabilization phase of supported employment. During this phase, the counselor documents the individual's adjustment to the job environment and job duties. Some indicators of stabilization include, but are not limited to, employer satisfaction, client satisfaction and minimal job coach intervention. The extended services phase continues during the 90 days after the end of the stabilization phase. Interagency

involvement begins from the point of referral for VR services provided by the Division and continues until the stabilization phase is completed and the long-term support provider begins providing extended services.

(r) **Vocational Rehabilitation Certifications and Assurances**

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,[4] and its supplement under title VI of the Rehabilitation Act[5];
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)[6] agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan[7], the Rehabilitation Act, and all applicable regulations[8], 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;
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[9], the Rehabilitation Act, and all applicable regulations[10], 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;

[4] Public Law 113-128.

[5] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

[6] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[7] 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.

[8] 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.

[9] 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.

[10] Applicable regulations, in part, include the citations in footnote 6.

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 title of State officer 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;
8.	The (enter title of State officer below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment 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.

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:	
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.	**Administration of the VR services portion of the Unified or Combined State Plan***:* The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

	(a) the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act. (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 (Option A or B must be selected): (A) is an independent State commission. **√(B) has established a State Rehabilitation Council.** (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. (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). (e) the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds, (Yes/No) **No** (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** (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) **No** See Section 2 of this VR services portion of the Unified or Combined State Plan. (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. (i) all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act. (j) the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act. (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. (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. (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: (a) comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act.

	(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 . (c) provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No) **Yes** (d) determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act. (e) comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act . (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. (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. (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. (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 (j) with respect to students with disabilities, the State, (i) has developed and will implement, (A) strategies to address the needs identified in the assessments; and (B) strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and (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*:*** (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. (b) The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.

	(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.	(a) **Financial Administration of the Supported Employment Program:** 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. (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.	(a) Provision of Supported Employment Services: The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act. (b) The designated State agency assures that: 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 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.