



# ARKANSAS WORKFORCE DEVELOPMENT BOARD

SPECIAL CALLED  
FULL BOARD MEETING

FEBRUARY 28, 2024  
10 A.M.

ARKANSAS DIVISION OF WORKFORCE SERVICES

## AGENDA

VIRTUAL VIA ZOOM

# AGENDA

February 28, 2024



## ARKANSAS WORKFORCE DEVELOPMENT BOARD FULL BOARD MEETING

10:00 a.m. - 11:00 a.m.

Call to Order ..... Thomas Anderson, Chairman

Roll Call.....Board Staff

### Agenda Item 1: ACTION

Minutes of January 16, 2024 Full Board Meeting ..... Thomas Anderson, Chairman

### Agenda Item 2: ACTION

#### **PY 24-27 WIOA Combined State Plan- Public Comments Revision**

Dr. Charisse Childers, Director  
*Arkansas Division of Workforce Services*

WIOA Core Program Directors  
*Arkansas Division of Workforce Services*

Board Open Discussion

Public Opportunity to Address the Board

Announcements

Adjournment

Location:  
**Virtual- ZOOM Platform**  
**Special Called Meeting**



**MINUTES**  
**ARKANSAS WORKFORCE DEVELOPMENT BOARD**  
**January 16, 2024**

The Arkansas Workforce Development Board convened on January 16, 2024, beginning at 10:04 a.m. The meeting was conducted virtually due to inclement weather. Chairman Tom Anderson presided with the following members voicing their presence: Mr. Thomas Anderson, Commissioner Joseph Baxter, Mr. Len Blaylock, Ms. Karen Breashears, Dr. Charisse Childers, Mr. Miles Crawford, Judge Bradon Ellison, Mr. William French, Mr. Randy Henderson, Ms. Rebecca Ives, Ms. Candice Lawrence, Ms. Holly Little, Mr. Brian Marsh, Dr. Trenia Miles, Mr. George Nunnally, Mr. Justin Major, proxy for Clint O'Neal, Mr. Mike Rogers, proxy for Governor Sanders Huckabee, Ms. Latanyua Robinson, Mr. Kelley Sharp, Dr. Ken Warden, and Dr. Cassandra Williams-Stokes.

Mr. Randy Finegan, Ms. Abby Houseworth, Mr. Charles Johnson, and Mr. Robert Thorne were unable to attend.

A quorum was established.

Chairman's Opening Comments: Chairman Anderson yielded the floor to Dr. Jerome Green, President of Shorter College, to provide a welcome to the Arkansas Workforce Development Board.

**Agenda Item 1-ACTION-Full Board Meeting Approval:** Chairman Anderson asked if there were any revisions/corrections that needed to be made to the November 7, 2023, minutes.

**Hearing none, a motion was made by Judge Brandon Ellison to approve the minutes and seconded by Mr. Brian Marsh. The motion carried unanimously with none opposed.**

**Agenda Item 2-INFORMATIONAL**

Chairman's Report- Chairman Anderson reminded everyone of the dates that have been solidified for the upcoming board meetings. The next board meeting will be on May 21, 2024, instead of April 16, 2024. AWDB member, Rachel Mize, with Stark Manufacturing in Western Arkansas, submitted a resignation letter effective 1-9-2024. Ms. Mize expressed her appreciation for being able to serve on the board. Chairman Anderson thanked Ms. Mize for her service to the board and wished her and her company much success in the future. Chairman Anderson also gave special recognition to Miles Crawford and Candice Lawrence who presented at the 2023 WIOA Partners Conference in November 2023. The meeting was attended by over 300 WIOA stakeholders and included guest presenters from the DOL Dallas Regional Office, Texas Workforce Commission, Texas Local Boards, Google.org, RIPL, Credential Engine, and many other state partners.

Director's Report: Dr. Childers provided an overview of A Stronger Workforce for America Act. A strong workforce development system is vital to strengthening our economy and providing economic opportunity for more Americans. When the Workforce Innovation and Opportunity Act (WIOA) was enacted in 2014, it made critical improvements to streamline the maze of federal workforce system's ability to provide high-quality services to workers and employers. A Stronger Workforce for America Act makes critical updates to WIOA that will increase the amount of skills development provided under the law, strengthen connections between employers and the workforce system, and put more Americans on

the pathway to a successful career. Lastly, this Act dedicates 50 percent of the adult and dislocated worker funding toward upskilling workers through “individual training accounts” (ITAs), on the job learning, and other employer led and industry relevant initiatives. It also raises the cap on “incumbent worker training” so local workforce boards, particularly in areas with low unemployment or high labor force participation, can help the currently employed workforce gain new skills to avoid displacement and advance their careers.

Staff Report-Eddie Thomas stated that he along with his team and other DWS staff are currently working on completing the State plan. Efforts are being made to provide more technical assistance training to our stakeholders. In November 2023, a training was held on performance and accountability. A grants management training was also held in December 2023 for local board members and ADWS staff. Eddie Thomas also stated that he is still working with DOL partners to resolve three outstanding monitoring reports. Eddie Thomas concluded his report by announcing Angela Cook as the new Assistant Director for Employment and Training and he yielded the remainder of his time for Ms. Cook to introduce herself to the board members.

### **Agenda Item 3-INFORMATIONAL-ACOM Realignment**

Secretary McDonald provided information on the ACOM Realignment. This realignment is an effort focused on the entire Department of Commerce by the Boston Consultant Group. Some areas of focus of the realignment are procurement, employment performance, and the state compensation system. Despite progress that has been made by the Department of Commerce, there are some divisions that are still operating as separate entities. Few divisions have clearly articulated their strategies, goals, aspirations, and KPI's. The ACOM Realignment seeks to: Refresh strategic priorities for departments, divisions, and leaders. Increase collaboration across Commerce divisions. Create new ways of working link performance evaluation system to KPI progress toward the vision. Streamline consistent systems and processes. Create a new organization structure with greater shared services and workforce development aligned to customer/employers connecting the dots.

### **Agenda Item 4- INFORMATIONAL-Governor's Workforce Strategy**

Mr. Mike Rogers stated that the Governor's Workforce Strategy is nearly complete. They are working on narrative summaries that will be easy for the public to understand. The narrative summaries will provide information on which agencies will be the lead and support agencies for carrying out specific strategies. A press release date will be coming soon pending the Governor's approval.

### **Agenda Item 5-ACTION- AWDB Bylaws Amendment**

The AWDB bylaws were revised and presented to the board at the last board meeting on November 7, 2023, with no suggested revisions. The bylaws have been forwarded and accepted by Governor Sanders. Chairman Anderson entertained a motion to approve the AWDB Bylaws Amendment.

**A motion was made by Mr. Miles Crawford to approve the minutes and seconded by Dr. Charisse Childers. The motion carried unanimously with none opposed.**

**Agenda Item 6-ACTION-Stipend Payments CY 2024**

Eddie Thomas read and reviewed the code on the Stipend Payment Declination Form Motion to the board members. Chairman Anderson entertained a motion to approve the authorization of stipend payments, in the amount of \$110.00 per meeting for those who are eligible for and who choose to accept the payment for calendar year.

**A motion was made by Mr. Kelly Sharp to approve the stipend payments for CY 2024 and seconded by Mr. Randy Henderson. The motion carried unanimously with none opposed.**

**Agenda Item 7-INFORMATIONAL-AWDB Member Required Forms & Disclosures**

Victoria Hall reminded the board members that their annual top of the year paperwork is due by or before January 31, 2024. Clarification was also provided on the steps needed to submit their notarized financial statements.

**Agenda Item 8- INFORMATIONAL-Reimagine Arkansas Workforce Grant**

Dr. Tara Dryer from the University of Arkansas Global Campus presented briefly on the progress made with their enrollees of the Reimagine Grant. UAGC continues to enroll students into the program. Current enrollment is 3,338. 964 students have completed the program. Dr. Dryer concluded her presentation by providing highlights of the population served, they have been able to reach very vulnerable populations throughout the state of Arkansas.

Dr. Angee Valentine from Shorter College provided updates on the progress made with their enrollees of the Reimagine Grant. 402 students have been enrolled with 113 students completing the program. 22 students have completed their internships. 1 student is currently in a cybersecurity internship and another student is waiting to start an internship in HR. Currently students in 34 counties are fully taking advantage of the Reimagine Grant. Enrollment is ongoing through the use of marketing advertising via social media, tv, and radio.

**Agenda Item 9-ACTION-WIOA Combined State Plan PY 2024-2027-Working Session & Review**

Dr. Childers provided a detailed overview of the layout of the state plan and provided information on who is responsible for Titles I-IV. The seven sections of the state plan are as follows: WIOA State Plan Type & Executive Summary, Strategic Elements, Operational Planning Elements, Coordination with Combined State Plan Programs, Common Assurances, Program Specific State Plan Requirements for Core Programs, and Program Specific Requirements for Combined State Plan Partner Programs.

Dr. Trena Miles stated that the Adult Education program will continue to focus on workforce development and increasing their certifications and credentials. They are currently looking throughout the state of Arkansas in the lithium and steel industries for integrated education and training opportunities.

Commissioner Joseph Baxter stated that Arkansas Rehabilitation Services is refocusing their attention on the primary indicators of their grant. ARS working towards increasing labor market participation rate for people with disabilities. They are also working on expanding their pre-transition services for students ages 14 and up. Commissioner Baxter believes that pre-transition services will help students see the benefits of working and gaining experience early in hopes of a steady transition to the workforce upon graduation from high school.

Dr. Cassandra Williams-Stokes provided an overview of the needs assessment conducted by UALR to ensure that the School for the Blind are still in alignment with their goals and plans. The School for the Blind is focused on making sure that their consumers are skilled with the technology needed to be employed in the workforce.

**A motion was made by Mr. Ken Warden to approve the WIOA Combined State Plan PY 2024-2027....and seconded by Mr. Kelly Sharp. The motion carried unanimously with none opposed.**

**Agenda Item 10-ACTION-WIOA Regional & Local Plan PY 2024-2027**

Dr. Claudia Griffin presented the WIOA Local Workforce Development Area's regional and local plans guidance. Plans must be submitted no later than April 15, 2024.

**A motion was made by Mr. Miles Crawford to approve the WIOA Regional & Local Plan Issuance for PY 2024-2027 and seconded by Ms. Rebecca Ives. The motion carried unanimously with none opposed.**

**Agenda Item 11-INFORMATIONAL-Arkansas WIOA System Evaluation & Customer Service Surveys**

In partnership with the ADWS, the University of Arkansas Counselor Education program will conduct a comprehensive evaluation of the workforce systems directed and managed by the Division. Dr. Brent Williams with the UA Counselor Education Program will serve as the Principal Investigator for the project and Dr. Vire with the Counselor Education Program will act as Project Director. Dr. Xinya Liang will serve as project statistician and will analyze all data. Dr. Jule Hill will design and manage project surveys.

Dr. Williams and Dr. Vire identified a good cross section of the state that captures the subtle nuances that exists across the states: Northeast, Southeast, Central Arkansas, City of Little Rock, Southwest, and Northwest. For each local area, leadership will be interviewed to identify partner programs and non-profits that collaborate with the Workforce Centers. Contractors will report on the existence of MOU's between programs, and entities, referral procedures, and training.

**Board Open Discussion:** Mr. Len Blaylock inquired about an update on the hiring of the board director. Dr. Childers will assume the role of the state workforce director under the new ACOM realignment.

**Public Opportunity to Address the Board:** None

**Announcements:** Dennis Williams announced that 15 high schools will participate in an upcoming reverse job fair in the Western Arkansas Workforce Development Area.

**Adjournment:** Chairman Anderson asked for a motion to adjourn the meeting. A motion was made by Mr. Kelly Sharp and seconded by Mr. Randy Henderson. The motion carried unanimously with none opposed. Meeting adjourned at 1:27p.m.

---

Thomas Anderson, Board Chairman  
Arkansas Workforce Development Board

---

Charisse Childers, Director  
Arkansas Division of Workforce Services

*Minutes recorded by Victoria Hall  
Arkansas Division of Workforce Services Staff*

# WIOA Combined State Plan Revisions- Public Comments PY 24-27

## Comment 1: Received on 2-1-24

“Page 23 Consider adding natural resources and mining to capture Silicon Carbide and Lithium (potentially others)”

**State’s Response: This consideration has been submitted to ADWS’ Labor Market Information unit for review. All changes will be included in the revised plan and submitted to the USDOL/USDOE WIOA state plan portal.**

## Comment 2: Received on 2-1-24

“Page 73 Where IEP is discussed, consider details about cross-walking IEP(K-12) to IAP(Higher Ed) to IDP(Employer). If the minor student with an IEP turns to a legal age, bring that document with modifications in with self-attest to LAUNCH to demonstrate modifications to higher education and employers. So much of the value of this work gets lost when the IEP/504 student graduates. This is revisited on Page 239.”

**State’s Response: The term “IEP” as discussed in the state plan derives from the United States Department of Labor definition. “Individual employment plan (IEP) – A plan developed by a participant and a case manager that identifies the appropriate employment goals, achievement objectives, and combination of services required for the participant to achieve the employment goals. This plan is an ongoing strategy to identify employment goals, achievement objectives, and an appropriate combination of services for the participant to achieve the employment goal. The plan may contain the chosen career pathway and steps to achieve the goals along the path [WIOA § 134(c)(2)(A)(XII)(II); TEGL 19-16]. (This term is not to be confused with an Individualized Educational Plan [IEP] required by federal law for every public-school child receiving special education services [34 CFR 300.347]. The term also is not to be confused with an Individualized Plan for Employment [IPE] required by federal law for eligible individuals receiving vocational rehabilitation services [34 CFR 361.45].)**

## Comment 3: Received on 2-1-24

“Page 173 Hay Rice needs a comma between Hay, rice”

**State’s Response: Correction made. All changes will be included in the revised plan and submitted to the USDOL/USDOE WIOA state plan portal.**



#### **Comment 4: Received on 2-1-24**

“Page 297 ETPL/E&T Providers appears short. Why wouldn’t all Community Colleges be listed here?”

**State’s Response: All training providers are welcomed and encouraged to apply for inclusion on the eligible training provider list, including community colleges. In order to remain active on the list, training providers must agree to participate in and adhere to USDOL regulations and procedures described in [WIOA Title I Policy- 4.5- Arkansas Division of Workforce Services Eligible Training Provider Policy](#).**

#### **Comment 5: Received on 2-22-24**

- “Arkansas Rehabilitation Services has commented on the state plan. Below are the sections where ARS made changes and comments.”
- Page 89 - ARS has made a change to reflect that ARS uses a cloud-based case management system. ARS has chosen not to identify the provider since a service provider is subject to change during the life of the state plan.
- Page 204 - ARS has made changes to the State Rehabilitation Council Composition Table. In accordance with Assurance 3(b), ARS is to provide current composition of the Council by representative type, including the term number of the representatives, as applicable, and any vacancies, as well as the beginning dates of each representative’s term. Due to delays in SRC membership appointments, ARS has adjusted the table to reflect positions that are currently vacant.
- Page 237 - ARS has removed the reference to the Division of Services for the Blind Arkansas (DSB) since DSB will provide comment on their Pre-ETS services. As a result of the FY2021 Rehabilitation Services Administration monitoring and resulting Corrective Action Plan, ARS revised the age range for Pre-ETS services from age 16 through 21 to as early as 14 through 21. ARS is optimistic that the Memorandum of Understanding with the Arkansas Department of education, Division of Elementary and Secondary Education, Office of Special Education can be revised to reflect this change by the state plan effective date.
- Pages 252-254 - ARS discovered after the draft plan was submitted for public comment that the GEPA Section 427 questions needed to be answered for both the VR program and the SE program. ARS only addressed the VR program. ARS has added answers for GEPA Section 427 for the SE program.

**State’s Response: All items will be included in the revised plan and submitted to the USDOL/USDOE WIOA state plan portal.**

## **Comment 6: Received on 2-22-24**

“The WIOA State Plans needs to include the State Workforce Strategy, as well as integration with LEARNS, PROTECT, and Perkins V.”

The strategy link is here: <https://governor.arkansas.gov/arkansas-workforce-strategy/>

**State’s Response: All items will be included in the revised plan and submitted to the USDOL/USDOE WIOA state plan portal. The Governor’s Workforce Strategy will be added to the “other appendices” section beginning on page 356 of current draft.**

## **Comment 7: Received on 2-22-24**

“Additional language, provided below, is being submitted to adequately address the infrastructure investment component of section III: Operational Elements- 2 (g)”

“Coordination and Alignment with Federal Infrastructure Investments

*Governors and State workforce development boards are encouraged to use the 2024 WIOA state planning process to reshape education and workforce development service delivery to take advantage of historic federal investments made possible through the Infrastructure Investment and Jobs Act, also known as the Bipartisan Infrastructure Law (BIL), the Creating Helpful Incentives to Produce Semiconductors (CHIPS) and Science Act, and the Inflation Reduction Act (IRA) (collectively referred to as Investing in America (IIA)). The majority of the jobs created through these investments will involve occupations that require some type of postsecondary credential. The programs incorporated into WIOA State Plans are well-positioned to assist workers in accessing good jobs created by these IIA investments and businesses to find the workers they need to flourish.*

In alignment with the Arkansas workforce strategy developed by the Chief Workforce Officer and the Governor’s Workforce Cabinet, the state workforce system will support Arkansas Investing in America programs through the following data-driven strategies, services, and practices:

- Infrastructure employer collaboratives will be established to identify and communicate current and future occupational, credential, and skill demand. The state will support these through Talent Pipeline Management tools, methodologies, data, and facilitation for continuously aligned sector strategies.
- New occupational, credential, and skill demand from infrastructure investments will be added to state labor market information, credential targets, and consumer information products.
- Updated data products, incorporating new infrastructure job creation and up/reskilling needs, will be provided to workforce boards, education and training providers, and other relevant stakeholders to inform alignment of programs with evolving needs.
- Infrastructure-related programs and credentials will be published as linked open data on credentials (LODC) to support credential transparency, interoperability, and issuance of Learning and Employment Records (LERs).

- Jobs created through infrastructure investments will be posted on the LAUNCH learning, employment, and advancement platform for skills-based connection of residents with opportunities.
- Integrated Service Delivery strategies will grow the skilled labor force through connection of available talent pools with training, employment, and wraparound supports.
- Infrastructure talent pipelines will be monitored leveraging the Statewide Longitudinal Data System (SLDS) to support continuous alignment and improvement efforts.
- Evaluation and research on the workforce and economic impact of infrastructure investments will be performed to inform policy and practice with data and evidence.”

**State’s Response: All items will be included in the revised plan and submitted to the USDOL/USDOE WIOA state plan portal.**

### **Comment 8: Received on 2-22-24**

“On page 116 of the ADWS State Plan under Youth Activities. The High Concentration of Youth Methodology appears to not be complete.”

**State’s Response: The revised language, contained within WIOA Policy 5.3, Change 1- High Concentration of Youth Award, includes the following:**

Part 1: ADWS Methodology to Define WIOA High Concentration of Eligible Youth for Additional Funding

- A. Calculate the individuals for each county in each of the categories relying on available data provided by LMI.
- B. Group the State’s 75 counties into LWDA’s and add the total number for each county in the LWDA to determine the total number in each LWDA. Some individuals will meet the criteria for more than one category. This calculation considers the number of barriers versus the number of individuals.
- C. In all category calculations for the City of Little Rock LWDA and Central LWDA, a percentage of Pulaski County totals are used. Percentage used for the City of Little Rock LWDA is City of Little Rock Population divided by Total Pulaski County Population.
- D. The LWDA’s weighted number of “Eligible Youth” is divided by the LWDA’s total population to determine what weighted percentage of the LWDA’s population consists of Eligible Youth.
- E. Any LWDA that has a weighted percentage of Eligible Youth, as compared to its overall population, that is equal to or greater than the risk factor designated by ADWS, will be deemed as having a “High Concentration of Eligible Youth” for purposes of the funding formula.
- F. Each LWDA meeting the aforementioned criteria, will be awarded additional youth funding. This is based on a formula of total Eligible Youth divided by the total dollars available to be awarded under the part one methodology. This multiplier is used to determine each LWDA’s amount to be awarded. (Note: this weighted percentage of Eligible Youth risk factor will be adjusted annually as required to meet ADWS’s goal of no less than 50% of the LWDA’s receiving funding.)

All items will be included in the revised plan and submitted to the USDOL/USDOE WIOA state plan portal.

### **Comment 9: Received on 2-24-24**

Page 149 - There are few areas of the current ETPL policy not included in the plan. Is that accurate?

**State's Response: All areas will be included in the revised plan and submitted to the USDOL/USDOE WIOA state plan portal.**

### **Comment 10: Received on 2-25-24**

"Dear Sir or Madam,

Disability Rights Arkansas, Inc. ("DRA") is the federally authorized nonprofit organization serving as the Protection and Advocacy System ("P&A") for individuals with disabilities in Arkansas. DRA is authorized to investigate abuse and neglect and advocate for and enforce the human, civil, and legal rights of all Arkansans with disabilities consistent with federal and state law. As Arkansas's designated P&A, we are the duly authorized Client Assistance Program (CAP) pursuant to 29 U.S.C. § 794e and 34 C.F.R. §§ 370.1-370.49.

Through our role as the CAP, our lawyers and advocates assist individuals with accessing vocational rehabilitation services, among other activities. DRA thanks you for the opportunity to comment on Arkansas's 2024-2027 Combined State Plan ("the Plan"). In the future, we hope the state would consider either extending public comment or ensuring that the public comment period ends on a business day, or at least a day other than Sunday.

At the outset, our comments are focused on those relevant to the state's VR system, namely Arkansas Rehabilitation Services ("ARS") and the Division of Services for the Blind ("DSB"). While we have some comments related to Sections I-V, most of our comments will concern the Program Specific Requirements described for ARS and DSB.

#### Comments Related to Sections I-V

Beginning on or around Page 5, the Plan identifies the division named "Arkansas Workforce Connection," which includes ARS and DSB, among others. This brief description of the division describes it as "employer-centric." While the Plan consistently refers to individuals with disabilities, we question whether the division should have the overarching principle of being "employer-centric" or, conversely, whether ARS and DSB are appropriately housed in an "employer-centric" division. It would seem antithetical to the purpose of the vocational rehabilitation system to operate in a way that is "employer centric," as the federal mandate for those services centers on the individual

with a disability, their vocational goals, and their needs for support.

On Page 6, the Plan identifies the appropriations for each division. In the identified appropriations for rehabilitation services, we believe that “Statewide Disability Telecommunications Equipment Program People with” on one line and “Disabilities Program” on the next line is likely in error. For clarity, we would suggest that this is corrected in the plan to more accurately reflect which program receives which allocation.

On Page 18 and throughout the Plan, the State describes apprenticeship opportunities. We believe that such opportunities could be an effective way to ensure community-based training and employment opportunities for individuals with disabilities, as opposed to facility-based or centralized training. We believe that training in the local community where individuals will ultimately seek to work is more likely to lead to gainful employment. That said, we hope the state will fully described how it will cultivate those programs, but more so how the state will support those individuals who might not otherwise be able to take advantage of those opportunities. Whether individuals have unmet needs related to their disabilities or they have financial commitments that cannot be met through unpaid or low-paying apprenticeships, the state should invest in those individuals to meet the future needs of the state relative to a skilled workforce.

Also on Page 18, we are pleased to see the state’s described commitment to diversity and inclusion.

On Page 50, the Plan describes the state’s weaknesses. One of the weaknesses we noticed is “funding models for education are inadequate.” While not necessarily the province of the Plan, we are concerned that the state’s overall policy toward reducing or otherwise removing funding from public schools needs to be altered to eliminate this crucial barrier to independence.

On Page 52, the Plan identifies ARS’s expertise in assisting employers to maintain employees who experience illness and injury. We have no doubt that they have such expertise; even so, we would like to see ARS take a more active or persistent approach in seeking to assist employers with identifying and implementing necessary accommodations.

Also on Page 52, the Plan notes transportation as a significant barrier to the population ARS and DSB serves. We would like to see a comprehensive plan developed to address this issue across the state. While the Plan, in many places, identifies the challenge transportation presents to vocational rehabilitation consumers, it does not appear to provide tangible ways to remove this barrier.

On Page 57, the Plan describes the need to espouse a welcoming environment, particularly that staff should be responsive and helpful. While we are unaware of the number of individuals assigned to each DSB counselor, we have received multiple

reports of ARS counselors with extremely large caseloads. We question the possibility of meeting this goal of being both responsive and helpful when counselors are tasked with caseloads so large they cannot devote the necessary time to each individual. While some individuals might not require a significant amount of time to support, individuals with the most significant disabilities likely require significant time that is unfortunately sacrificed. The state should carefully consider whether it has the means to truly provide the substantial support that might be necessary to support all eligible individuals or whether it needs to move toward an order of selection to devote more time and resources to the individuals who have the most significant disabilities.

On Page 58, the Plan describes the goal of ensuring frontline staff understanding the functions and basic eligibility requirements. We have assisted multiple individuals who were supplied eligibility information that is inconsistent with federal requirements – not only from frontline staff, but also from counselors and managers. We believe that commitment to accuracy and transparency regarding eligibility for services and functions of the organization would cultivate a better relationship between the vocational rehabilitation agencies and those they serve.

Also on Page 58, the Plan describes virtual services. This can be an incredible benefit to individuals with disabilities, especially those who are experiencing challenges related to transportation. We would ask that the vocational rehabilitation agencies also consider house calls for those who are comfortable, services by phone (for those who might not have internet access), and other ways to remove barriers to accessing vocational rehabilitation from referral to closure.

Also on Page 58, we are pleased to see that the workforce centers are moving toward universal design to ensure accessibility. We believe the state should provide a public opportunity to review a tangible plan that identifies the changes proposed and when those will be implemented. We urge the state to retain people with disabilities in evaluating its design decisions. Ultimately, we encourage the agencies to promote the ways it is employing universal design to encourage other state agencies and private businesses to employ means of intentional accessibility.

On page 60, the Plan states the following: “Persistent, incremental accommodations or assistance can often result in a safety net that can eventually lead to huge gains for the individuals seeking help raising the overall level of economic prosperity for the community, when they achieve positive labor market outcomes.” We hope that the state embraces this philosophy in other areas of support. Other states have found that expanding this goal, which requires significant front-end investment in health care and education, particularly, has elevated the growth and stability of their labor markets and economies.

On Page 61, the Plan notes a goal of developing a “menu of services.” We would suggest that the state ensure that such menu is in plain and accessible language, with examples

to clarify technical terms. Many of the vocational rehabilitation clients we assist were merely asked by their counselor to identify the assistance they required, instead of a description, in plain language, of the scope of services available through vocational rehabilitation. Often, when we describe the full scope of services, our clients are astonished at what other services are available. Further, the state should ensure transparency with vocational rehabilitation consumers regarding any limits or “thresholds” applied to services and the ability to seek exceptions to those limits.

On Page 73, the Plan states: “Vocational Rehabilitation (VR) services provides activities necessary to assist individuals with disabilities to prepare for, secure, retain, or regain competitive integrated employment.” The federal requirements for vocational rehabilitation include services to assist individuals with disabilities to *advance in* employment as well. Several times, we have had to assist individuals who were rejected by ARS “because they were already working.” This concern dovetails with our comment regarding the Plan’s goal for frontline staff understanding the functions and basic eligibility requirements on Page 58.

Also on Page 73, the Plan discusses transition services. We believe that the vocational rehabilitation agencies need to double their effort toward youth, both through preemployment transition services, and through traditional vocational rehabilitation. WIOA emphasizes serving youth to achieve a long-term benefit to the community at large. We do not see why ARS, particularly, would wait until an individual’s last months of school to provide traditional vocational rehabilitation services, particularly when the Plan identifies the state’s underfunded system of public education.

#### Program Specific Requirements - ARS

On page 205 under Response to Council’s Input and Recommendations a new Client Satisfaction Survey is discussed. When and where will this be piloted?

On page 206, there is a discussion of transportation being an issue for individuals with the most significant disabilities. Has ARS considered assisting people with down payments on a vehicle? What about the tax, title, and license? Or early car insurance payments? What other options for assisting with transportation has ARS considered?

On page 207, there is a recommendation to hire a workforce representative of the population it serves to bolster confidence/trust in service delivery. Hiring more individuals with disabilities, including individuals with significant disabilities, should also be a priority.

Page 207 discusses underserved and unserved populations including those requiring long-term support. Stronger partnerships with PASSEs would be helpful in this endeavor. This includes providing field staff with ongoing training on PASSEs and having a process for seamless communication.

Page 208 discusses a recommendation for using a common referral form. What would

this look like? How long would it be? The current referral form for ARS is already quite lengthy. While we applaud the State for wanting to streamline the process of individuals becoming eligible for various services, we hope that the referral form is short and only asks what is necessary in determining eligibility as requiring more information than is necessary to make an eligibility determination can have a negative effect.

Page 209 discusses a recommendation of offering incentives to attract and retain job coaches. Would these job coaches work for ARS or Community Rehabilitation Programs? Is ARS planning on providing in-house supported and/or customized employment?

Priority 2 under Goal 1 on page 210 is about providing career counseling to 14© program participants to meet Section 511 requirements.

On Page 225, it says ARS received almost 500 referrals in PY2021-2022 as a result of this career counseling. How many referrals resulted in a determination of eligibility for services at ARS?

How many clients does ARS currently have an open case with who came from working subminimum wages jobs?

Priority 1 under Goal 3 on Page 211 discusses that students should begin the VR process during the onset of their Junior year. It is important to consider that this timeframe still may be late for some, especially individuals with most significant disabilities and those who are at risk of dropping out. The VR process should always be highly individualized.

Priority 3 under Goal 3 on page 212 discusses expanding Pre-ETS by adding up to 10 more schools per year. What schools currently have a Pre-ETS program? How are selections of new schools being determined? Why not add more schools per year? What happens to students at schools who are not part of Pre-ETS? What services are they offered? We recommend that information about what schools are part of the Pre-ETS program, how a school applies, how a student applies if their school has a program, and information on the options a student has if their school doesn't have a Pre-ETS program should be easily accessible. Pre-ETS, as with VR, should be a highly individualized program.

Priority 3 under Goal 3 on page 212 discusses Work-Based Learning, Pre-Apprenticeship, and On the Job Training which could provide individuals with the experience needed to gain employment. Why isn't a higher percentage of students participating in these programs set as the goal? Additionally, five seniors per year in OTJ and apprenticeships seems low as well.

Priority 1 under Goal 4 on Page 212 discusses apprenticeships and on-the-job training for adults. Why is the goal of utilization of OTJ and apprenticeships to increase by only 10%?

Priority 2 under Goal 4 on page 213 discusses increasing referrals and mentions a short referral form. What does the short referral form look like? When discussing adopting the



rapid engagement method – how rapid would the goal of the process be? Many individuals with disabilities have to jump through hoops for so many services. An agency that is geared towards assisting someone find or maintain employment should not be one of them.

Priority 4 under Goal 4 on page 213 says, “ARS will increase utilization of VR funds to 90% or higher of the authorized funding”. What percentage of funding is currently being utilized? Additionally, the plan states that ARS is going to, “Revise the current budget allotment structure to remove budget constraints.” VR might want to consider prioritizing those with most significant disabilities even if that means being under an order of selection. We realize that budgets might be part of how a counselor is evaluated, but we would like to see that removed as a measure of someone’s performance. Priority 2 under Goal 5 on page 215 discusses expanding ACDC, but what efforts will go towards reaching out to trade schools, community colleges, and 4-year colleges more? Instead of expanding ACDC, ARS could focus on assisting higher education institutions in the community with inclusivity.

Priority 2 under Goal 1 on page 216 mentions how 14c career counseling is held virtually. To ensure the greatest engagement from individuals career counseling should be in person on an individual basis as often as possible. Additionally, we are interested in knowing what training staff who provide career counseling are given as well as what materials they utilize when speaking to individuals who are working subminimum wage jobs.

Priority 2 under Goal 2 on page 218 states, “Pre-ETS counselors were provided with training, resources, and a streamlined process on engaging Pre-ETS participants in the VR process as soon as a need for VR services was identified.” How has the process been streamlined for those engaging in Pre-ETS to transition to VR? How would a Pre-ETS counselor identify the need for a Pre-ETS participant to receive VR services?

Priority 1 under Goal 3 on page 219 discusses BEU’s meeting with business and community leaders. When that occurs what information does BEU provide?

Priority 5 under Goal 4 on page 224 discusses Access and Accommodation making application forms for community service providers. What does/will that form look like? Which specific community service providers will have access to this form? If a completed form was turned in what would be the next steps?

Fast Wednesdays are discussed on page 227. What regions currently utilize Fast Wednesdays?

On page 228, it is stated that “ARS refers individuals for Supported Employment services to one of 69 certified CRPs. Supported Employment services are provided to individuals with a most significant disability, including youth with a most significant disability.”

However, on page 225, it is stated that “Currently, ARS has 80 vendors.” Can you please explain this discrepancy?

General Questions for ARS:

How often do counselors attend IEP meetings?

How is ARS capturing the most significantly disabled within Pre-ETS?

Program Specific Requirements – DSB

Page 257 discusses the issues of limited-service providers. What is DSB doing to combat this issue?

Page 258 discusses an Apprenticeships Pilot program. Where can we learn more about this?

On page 264, why is the number of eligible individuals expected to receive services under supported employment only 5?

Page 268 discusses the Supported Employment Pilot Program. Where can more information be found about this program?

General questions for DSB:

Has DSB considered putting their application on the website to fill out electronically as another option for individuals?

General Comments for both ARS and DSB

Customized employment should have its own goal and strategies to achieve the goal as it is a more intensive employment option.

Comprehensive Transition and Postsecondary Programs (CTPs) can be a great option for individuals. Additional funding should be allocated for CTP’s to ensure individuals can access the programs.

To ensure collaboration between ARS and DSB in dual-cases, an established liaison could be helpful.”

**State’s Response: WIOA Title IV partners are currently preparing a response to comments listed above. All applicable changes will be included in the revised plan and submitted to the USDOL/USDOE WIOA state plan portal. Responses to general questions included in the comment will be provided directly to the commenter and other interested parties.**

