## Oregon 2020-2023 WIOA Combined State Plan



Oregon PYs 2020-2023
Overview
Options for Submitting a State Plan
How State Plan Requirements Are Organized
I. WIOA State Plan Type and Executive Summary
a. WIOA State Plan Type
Combined Plan Partner Program(s)
b. Plan Introduction or Executive Summary
II. Strategic Elements
a. Economic, Workforce, and Workforce Development Activities Analysis
b. State Strategic Vision and Goals
c. State Strategy4
III. Operational Planning Elements
a. State Strategy Implementation48
b. State Operating Systems and Policies
IV. Coordination with State Plan Programs
V. Common Assurances (For All Core Programs)
VI. Program-Specific Requirements for Core Programs97
Program-specific Requirements for Adult, Dislocated Worker, and Youth Activities under Title I- B98
Program-Specific Requirements for Wagner-Peyser Program (Employment Services)
Program-specific Requirements for Adult Education and Family Literacy Act Programs
Program-Specific Requirements for Vocational Rehabilitation (Combined or General)172
Program-Specific Requirements for Vocational Rehabilitation (Blind)
VII. Program-Specific Requirements for Combined State Plan Partner Programs
Temporary Assistance for Needy Families (TANF)
Employment and Training Programs Under the Supplemental Nutrition Assistance Program (Programs Authorized Under Section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
Trade Adjustment Assistance (TAA)
Senior Community Service Employment Program (SCSEP)
Housing and Urban Development (HUD) Employment and Training Activities
Performance Indicator Appendix
All WIOA Core Programs

Additional Indicators of Performance	469
Other Appendices	469

## Overview

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

## Options for Submitting a State Plan

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

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

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

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)
- Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)

- Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))
- Trade Adjustment Assistance for Workers programs (Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.)
- Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))<sup>1</sup>
- Reintegration of Ex-Offenders program (programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

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

## How State Plan Requirements Are Organized

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

- The **Strategic Planning Elements** section includes analyses of the State's economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State's workforce development system and alignment strategies for workforce development programs to support economic growth.
- The **Operational Planning Elements** section identifies the State's efforts to support the State's strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination. Operational planning elements include:
  - State Strategy Implementation,
  - State Operating Systems and Policies,
  - o Assurances,
  - o Program-Specific Requirements for the Core Programs, and

 Program-Specific Requirements for the Combined State Plan partner programs. (These requirements are available in a separate supplemental document, Supplement to the Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan Requirements. The Departments are not seeking comments on these particular requirements).

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

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

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

# I. WIOA State Plan Type and Executive Summary

## a. WIOA State Plan Type

**Unified or Combined State Plan.** Select whether the State is submitting a Unified or Combined State Plan. At a minimum, a State must submit a Unified State Plan that covers the six core programs. Unified or Combined State Plan. Select whether the State is submitting a Unified or Combined State Plan. At a minimum, a State must submit a Unified State Plan that covers the six core programs.

**Unified State Plan**. This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs.

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

This is a combined plan

## Combined Plan Partner Program(s)

Indicate which Combined Plan partner program(s) the state is electing to include in the plan.

Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)

No

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

#### Yes

Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))

#### Yes

Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))

No

Trade Adjustment Assistance for Workers programs (activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))

Yes

Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.)

No

Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)

No

Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))

Yes

Employment and training activities carried out by the Department of Housing and Urban Development

Yes

Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))

No

## b. Plan Introduction or Executive Summary

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

#### COVID-19 Acknowledgement

Oregon's 2020-2023 WIOA State Combined Plan was prepared prior to the COVID-19 global pandemic. There has not been an opportunity to adjust any of the Plan elements to reflect responses to the COVID-19 emergency. Oregon expects to make modifications to the 2020-2023 WIOA State Combined Plan at an appropriate time. Since all states will likely be in a similar situation, Oregon requests Guidance regarding the content and process of COVID-19-related modifications.

#### Introduction to Oregon's 2020-2023 WIOA State Combined Plan

Oregon's Combined State Plan reflects the work of multiple agencies and organizations. Each of these entities have their own missions, visions, and values and this Plan weaves these together on behalf of the broader workforce development system to realize equitable prosperity for all Oregonians. Delivering on this requires keen attention to the employment and skill needs of business and industry both now and into the future and requires access to timely education and training for all individuals that is both valued in the marketplace and also results in or creates a pathway to self-sufficiency. This

Plan demonstrates Oregon's commitment to continuous improvement in the workforce development system to ensure increasing alignment of priorities and strategies to maximize resources currently within the workforce development system and to leverage additional resources not yet a part of the system.

## **II. Strategic Elements**

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

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

The Unified or Combined State Plan must include an analysis of the economic conditions, economic development strategies, and labor market in which the State's workforce system and programs will operate.

## 1. Economic and Workforce Analysis

## A. Economic Analysis

The Unified or Combined State Plan must include an analysis of the economic conditions and trends in the State, including sub-State regions and any specific economic areas identified by the State. This must include—

### i. Existing Demand Industry Sectors and Occupations

Provide an analysis of the industries and occupations for which there is existing demand.

#### ii. Emerging Demand Industry Sectors and Occupations

Provide an analysis of the industries and occupations for which demand is emerging.

#### iii. Employers' Employment Needs

With regard to the industry sectors and occupations identified in (A)(i) and (ii), provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

#### Introduction to Oregon's Economic and Workforce Analysis

Oregon's economy is strong as it wraps up its ninth year of job growth and third year of record low unemployment. Job growth is strong, with 27,800 jobs added in the past 12 months. Oregon is adding jobs at about the same pace as the nation. This long-run of job growth has helped to lower the unemployment rate to record lows for the state.

The unemployment rate dropped to record lows three years ago, with Oregon's rate dipping to 4.6 percent in October 2016. It has remained in record low territory ever since, ranging between 4.1 percent and 4.4 percent. Most recently, Oregon's unemployment rate was 4.1 percent in October

2019. Oregon's historical average unemployment rate is 7.0 percent, so the current level of low unemployment presents much tighter labor force conditions than typical for the state.

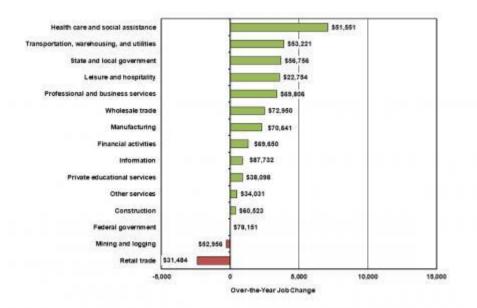
Oregon's economy faces many of the same demographic challenges seen across the nation, such as the aging of the workforce and baby boomer retirements, fewer young people participating in the labor force, and slower job growth in rural areas. Oregon's labor force growth has been relatively slow during the past three years, stabilizing around 2.1 million people. Population growth has driven labor force growth in recent years. This is a result of natural increase (births minus deaths) and net migration. As labor force participation trends down due to increased retirements and lower participation among youth, future labor force growth could be limited to the rate of population growth.

Current forecasts indicate Oregon's economy will continue to see similar job growth over the next few years, before slowing significantly in 2023 and beyond. The December 2019 Oregon Office of Economic Analysis' Economic and Revenue Forecast projects the state will gain 121,300 jobs by 2025. The unemployment rate is expected to stay close to where it is, with the annual average for 2020 forecasted to be 3.8 percent. The rate is expected to rise to 4.0 percent in 2022, before stabilizing around 4.3 percent through 2025.

#### Oregon's Economic Analysis

Graph 1 shows the number of jobs by industry added during the previous year and the average annual pay in those industries in 2018. The gains have been in industry sectors with high-, middle-, and low average pay. Health care and social assistance added 7,100 jobs, the most for any sector. Other sectors driving Oregon's job growth are transportation, warehousing, and utilities (3,900), state and local government (3,700), leisure and hospitality (3,600), and professional and business services (3,400 jobs). Retail trade was the only large sector with significant losses during the past year and is down 2,400 jobs. Retail trade job losses are occurring nationally, not just in Oregon.

Graph 1. Oregon Job Growth and Average Pay by Industry Comparing October 2018 to October 2019 and Displaying 2018 Average Pay.

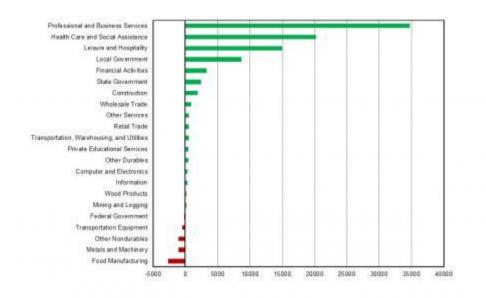


Source: Oregon Employment Department

Graph 2 shows the projected net job change from the fourth quarter of 2019 to the fourth quarter of 2020. Net job gains are expected across all the major private industries. Professional and business services is expected to continue adding a lot of jobs (+11,600), followed by health care and social

assistance (6,800), leisure and hospitality (5,000), and local government (2,900), which includes public K-12 schools and public higher education.

Graph 2. Expected Job Changes by Industry Sector Over the Year Comparing the Fourth Quarter of 2019 to the Fourth Quarter of 2020.



Source: OED analysis using OEA Forecast, December 2019

## B. Workforce Analysis

The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA<sup>4</sup>. This population must include individuals with disabilities among other groups<sup>5</sup> in the State and across regions identified by the State. This includes—

[4] Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents (including single pregnant women); and long-term unemployed individuals.

[5] Veterans, unemployed workers, and youth, and others that the State may identify.

#### i. Employment and Unemployment

Provide an analysis of current employment and unemployment data, including labor force participation rates, and trends in the State.

#### ii. Labor Market Trends

Provide an analysis of key labor market trends, including across existing industries and occupations.

#### iii. Education and Skill Levels of the Workforce

Provide an analysis of the educational and skill levels of the workforce.

#### iv. Skill Gaps

Describe apparent 'skill gaps'.

#### Oregon's Workforce Analysis

The Portland-Vancouver-Hillsboro area is Oregon's largest metropolitan area and is split along the Oregon and Washington state border. Most of the metro area's residents and jobs are on the Oregon side. The Portland metro area has a labor force of more than 1.3 million people. Because Portland's economic region crosses the state border, many workers in Oregon actually live in Washington. In 2017 there were about 85,000 people working in Oregon who lived in Washington. The area's 3.9 percent unemployment rate was about the same as Oregon's statewide unemployment rate in October 2019.

Unemployment rates tend to be about the same or slightly higher in Oregon's other metro areas. The unemployment rate in the Bend-Redmond metro area is 4.1 percent, Eugene is 4.4 percent, Salem is 4.4 percent, Medford 4.6 percent, Albany is 4.7 percent, and Grants Pass is 5.4 percent. Although the unemployment rate is higher in Grants Pass, it too is at record low levels for the area. The exception is the Corvallis metro area, which is economically buoyed by Oregon State University. At 3.3 percent, Corvallis has the lowest unemployment rate in the state.

Unemployment is higher in the eastern and southern regions of the state. Grant County in eastern Oregon has the highest rate at 7.0 percent. Other counties with especially high unemployment are Klamath County (6.7%), Wallowa County (6.5%), and Lake County (5.8%). Overall, non-metro area unemployment was 5.1 percent in October 2019.

Figure 1. Map of Oregon Counties showing the Seasonally Adjusted Unemployment Rate for October 2019.



Source: Oregon Employment Department, Local Area Unemployment Statistics

As workers progress in their careers, they may change occupations. This creates an opening in the occupation they leave that can be filled by someone new to the occupation who may need training to

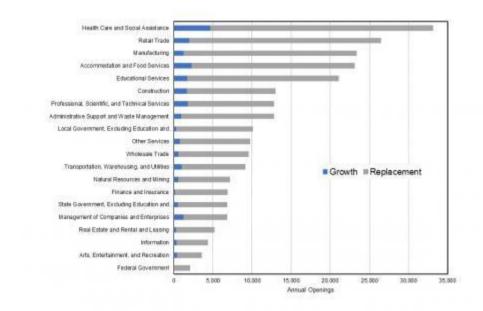
fill that opening. Also, when a worker reaches the end of their career, they leave the labor force, again creating an opening that may require a trained worker to fill it.

We use the phrase "replacement openings" for the total number of occupational openings due to people changing occupations or leaving the labor force. Far more workers are needed to fill replacement openings than for "growth openings" that are due to net job growth. Even in some occupational groups with little anticipated net job growth, replacement openings can be numerous.

Projections by the Oregon Employment Department indicate that Oregon will have about 25,000 job openings each year due to economic growth between 2017 and 2027. However, there are going to be an additional 238,000 replacement job openings annually from workers permanently leaving their occupations, mostly due to retirements.

Projected growth and replacement job openings by industry are shown in Graph 3. Health care and social assistance will have the most openings through 2027, but of the 33,000 expected openings each year, 86 percent will be due to replacement needs. In fact, most job openings across industries will be from replacements as more workers enter retirement. As the labor force continues to age, replacement openings are likely to become more numerous and the associated need for training is likely to grow.

Graph 3. Projections for 2017-2027 of Average Annual Job Openings by Industry in Oregon.





#### Key Labor Market Trend - Shifting Hiring Conditions Among Oregon Employers:

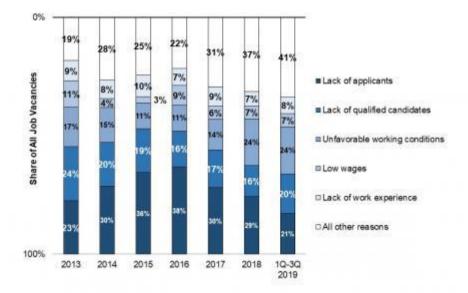
Throughout the year, the Oregon Employment Department surveys private employers from all industries and areas of the state to ask about the job vacancies they are actively trying to fill. Employers provide the job title, starting wage, and education and experience requirements for each of their vacancies. They also specify whether their vacancies are for full or part-time positions, and permanent or seasonal jobs. If they face hiring challenges, employers also write in the primary reason for difficulty filling each job opening.

The Oregon Job Vacancy Survey has included an open-ended question about employers' difficulty filling job openings since 2013. In that year, businesses cited a lack of qualified candidates as the

most common hiring challenge. This difficulty finding workers with a specific mix of education and experience accounted for 3,600 (24%) of all hard-to-fill vacancies with reasons provided.

As hiring demand strengthened, employers' hiring challenges shifted. Each year from 2014 through 2018, a lack of applicants was the most common reason businesses gave for difficulty filling vacancies. The share of difficult-to-fill vacancies with either too few or no applicants peaked during 2015 and 2016, the period of the strongest annual job growth in Oregon during this expansion (3.4% and 3.0%, respectively). In 2016 alone, a lack of applicants accounted for 12,100 (38%) of all difficult-to-fill job openings.

Graph 4. Profile of the Reasons for Difficult-to-Fill Job Vacancies in Oregon for 2013 through the Third Quarter of 2019.



Source: Oregon Employment Department, Oregon Job Vacancy Survey

As Oregon reached its record low unemployment rate (4.0%) in November 2016, and has maintained that low unemployment for three years, a new hiring challenge has emerged. "Unfavorable working conditions" includes part-time, on-call, overnight, or inconsistent work schedules, as well as difficult physical working conditions. Employers reported unfavorable working conditions as the primary hiring challenge for 3,100 (or 11%) of the difficult-to-fill vacancies in 2015 and 3,600 in 2016 (11%). That grew to 5,000 (14%) in 2017, and rose again to 6,500 (24%) in 2018. During the first three quarters of 2019, the share has remained stable at 24 percent.

At the same time, the lack of applicants has declined, and other reasons have become slightly more prominent as businesses' primary hiring challenges. Among those has been an increase in difficulty filling jobs because of the work location. This challenge tends to occur in rural areas of the state. More businesses have also reported difficulty filling job openings due to a lack of affordable housing in the area – particularly along the North Coast, in Central Oregon, and in the Columbia Gorge.

Oregon's private employers have reported nearly 53,000 job vacancies at any given time through the first three quarters of 2019. While that's a decline of about 9 percent from nearly 58,000 job vacancies in 2018, hiring demand is still relatively strong. To date in 2019, the number of job openings looks similar to the levels seen during the strongest job growth in this expansion during 2015 (48,000 vacancies) and 2016 (51,000).

With three years of unemployment rates at or near record lows and continued demand for labor, employers offering jobs with difficult physical or scheduling conditions are increasingly reporting these

challenges as the primary difficulty filling vacancies. Offering higher wages, employee perks, or benefits may be strategies to broaden interest in vacancies. Jobs with unfavorable working conditions also tend to require relatively less training or experience. This could open opportunities for workforce development organizations to help connect job seekers amenable to tough physical jobs or alternative work schedules with businesses struggling to fill those types of jobs.

#### Key Labor Market Trend - Automated/Autonomous Vehicles:

Oregon's eight primary driving occupations and 14 secondary autonomous vehicle-affected occupations will account for 5 percent of total employment with 104,000 jobs in 2027. Over the following 10 to 15 years, various household autonomous vehicle (AV) adoption scenarios – either personal ownership or shared/fleet use – could affect between 11,700 and 14,700 jobs. That totals between 11 percent and 14 percent of all jobs in those occupations.

Commercial trucking scenarios for AV adoption could affect between 29,800 and 32,600 jobs in these occupations looking into the 2040s, depending upon the pace of implementation. Those impacts would be felt for between 29 percent and 31 percent of all jobs in primary driving and secondary affected occupations.

Table 1. Estimates of Oregon Jobs affected by 2040 under Various Household and Commercial Adoption Scenarios.

Combined Household and Commercial Adoption Scenario	Jobs Affected*
Personal Cars + Slow Trucking	41,500
Fleet Cars + Slow Trucking	44,400
Personal Cars + Fast Trucking	44,300
Fleet Cars + Fast Trucking	47,200

\* Affected does not always equal "lost". Some affected occupations may still exist, with notably different skills and responsibilities on the job.

Source: Oregon Employment Department calculations using framework from Preparing U.S. Workers and Employers for an Autonomous Vehicle Future, Groshen et al., June 2018.

Taken together, the various combinations of personal and commercial AV adoption scenarios could affect between 41,500 and 47,200 jobs in Oregon, starting around the year 2030. The largest impacts would occur for heavy and tractor-trailer truck drivers under the commercial scenarios, where 16,200 to 17,500 jobs could be affected. Under the household AV adoption scenarios, estimated job effects are largest for automotive service technicians and mechanics (4,000) and service station attendants (2,600 to 3,900).

Workers in primary driving jobs affected by AV adoption are slightly more likely to be workers nearing retirement. While one out of every four jobs in Oregon is held by a worker age 55 or older, about one-third of workers in primary driving jobs are at least 55 years old.

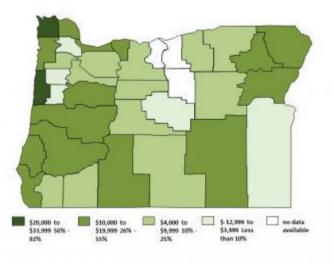
#### Key Labor Market Trend - Forest Industry Sector:

Forest sector-related employment in Oregon totaled 61,100 in 2017, which accounted for 3 percent of Oregon's workforce. Forest-related jobs paid relatively well, with an annual average wage of \$54,200, roughly 6 percent more than \$51,100 for all jobs covered by unemployment insurance in 2017.

Although metros accounted for twice as many of these jobs, forest sector employment made up 7 percent of all rural employment, compared with 2 percent of all metropolitan area employment. In Grant County, one out of every five jobs (21%) was forest-related. The sector accounted for more than 10 percent of the total in Douglas, Jefferson, and Lake counties.

The forest sector also held relative importance to rural Oregon in terms of wages. In metropolitan areas, forest sector wages sometimes paid less than the annual average for all jobs, but could also pay as much as 35 percent more. Meanwhile, forest sector jobs in rural areas paid as much as 92 percent more than all jobs. That was the case in Clatsop County, where forest sector jobs paid an average of \$70,600, compared with \$36,800 for all jobs. Lincoln County was similar, with an average annual forest sector wage (\$68,400) that was 86 percent above the all-job average (\$31,200).

Figure 2. Map of Oregon Counties showing the Forest Sector Wages relative to All Covered Jobs in 2017. All Covered Jobs in Oregon is \$3,100 (or 6%) Higher.



Sources: Oregon Employment Department, Quarterly Census of Employment and Wages; U.S. Census Bureau Non-employer Statistics

#### Key Labor Market Trend - Maritime Industry Sector:

Oregon's maritime sector workforce totaled nearly 19,000 in 2017. Oregon's covered maritime industries paid a total of nearly \$608 million in wages in 2017. The average annual wage of covered jobs in Oregon's maritime industry was \$60,853. That is 19 percent higher than Oregon's overall annual wage of \$51,117. Average annual wages vary depending on industry, ranging from a low of \$27,850 in fish and seafood markets to a high of \$139,144 in sea and coastal transportation.

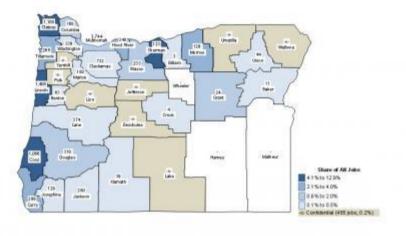
Maritime Workforce	Number of Jobs
Covered Maritime Sector Jobs	10,019
Commercial Fishing in Oregon	3,498
Commercial Fishing in Distant Waters	1,447
Mariners with a U.S. Coast Guard Credential	2,598
J.S. Coast Guard and Navy Service Members	1,653
Total Maritime Workforce*	18,981

Table 2. Oregon's Maritime Workforce in 2017

\* C om the total to avoid double-counting Source: Oregon Employment Department from various sources.

Maritime sector jobs are prevalent on the Oregon Coast, of course, but maritime sector jobs can be found in 33 of Oregon's 36 counties. The only counties without a measurable maritime workforce were Harney, Malheur, and Wheeler counties.

Figure 3. Map of Oregon Counties showing the Maritime Sector Covered Jobs and Maritime Nonemployers. The Total for Oregon is 12,036 (0.06% Share of All Jobs).



Source: Oregon Employment Department (2017) and U.S. Census Bureau, Nonemployer Statistics (2016)

In some communities, maritime sector jobs are a large portion of the total workforce. The counties with the largest portion of workforce in the maritime sector are Sherman (12.9%), Lincoln (6.5%), Clatsop (5.2%), Coos (4.1%), Curry (3.6%), and Tillamook (2.3%).

The maritime sector workforce tends to be older than Oregon's overall workforce. About 27 percent of jobs in Oregon's covered fishing, maritime manufacturing, and transportation jobs are held by workers age 55 years and over. That's a higher share than the 23 percent of the overall workforce.

#### Key Labor Market Trend - Defining a True Wage:

The Oregon Workforce and Talent Development Board (WTDB) aims to support Oregon workers as they pursue careers that allow them to prosper and provide for themselves. To this end, the board sought additional information about the current definition of "high-wage jobs" in Oregon and whether it meets the threshold of self-sufficiency, especially for all regions of the state and for all family types. To review the relevant issues and develop possible recommendations, the board formed a task force to review how the current definition of high-wage occupations was used by workforce partners and state agencies, and compared that definition with definitions used in other states.

Oregon is currently using an "above median wage" definition of high wage jobs, comparing an occupation's median wage with the median across the state or local workforce area. Oregon's definition is similar to other states that currently have definitions for high-wage jobs; in most cases either a median or a mean wage is used to define occupations or industries with high wages.

The True Wage Task Force defines a "true wage" as a wage that meets or surpasses the threshold of self-sufficiency in all regions of the state and for all family types. Defining a true wage is a complicated

endeavor. It includes analysis of the compensation and benefits for many different occupations compared with a broad analysis of cost-of-living components in all regions of the state and for all family types.

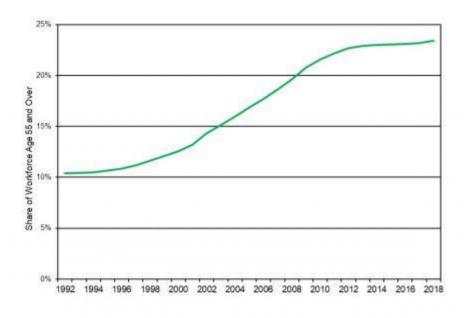
A review of existing regional and national initiatives to measure self-sufficiency showed that many of these measures focus on identifying a spectrum of thresholds which describe what income level it takes for a household to be self-sufficient. Our staff also provided information about the benefits offered by employers based on original survey research, collected data about the state's housing market, and provided U.S. Department of Education student debt data for Oregon post-secondary institutions.

The resulting report *Understanding the True Costs of Self-Sufficiency* helped define the problem, provided some related data and analysis, and helped the task force lay the groundwork to develop recommendations so that the board can coalesce around a "true wage" definition. Two key policy areas arose out of this report related to housing and childcare which are acknowledged as key workforce issues. This foundational work will underpin future research and support the development of tools and resources that would assist business and policy stakeholders as they track self-sufficiency in Oregon.

#### Workers with Barriers - Older Workers:

Baby boomers have dramatically changed the age structure of Oregon's workforce. In 1998, the oldest baby boomers were just 52 years old and the overall workforce was much younger. Two decades ago, just over 10 percent of Oregon's workforce was age 55 years or older. In 2018, 23 percent of Oregon's workforce was 55 years and over (Graph 5).

Graph 5. The Share of Oregon Workers Who are 55 or Older between 1992 and 2018. Nearly One out of Four Workers in Oregon is 55 or Older.



Source: U.S. Census Bureau, Local Employment Dynamics

The number of workers in Oregon who were 55 years and over reached nearly 439,000 in 2018. Of those workers 124,000 were age 65 years and older and working past the traditional age of retirement.

Older workers can be found in jobs in all industries, of course, but some industries have a large concentration of older workers. In Oregon, the industry sectors with a larger than average share of workers 55 years and older are mining (32%), utilities (31%), agriculture and forestry (31%), real estate (29%), transportation and warehousing (29%), public administration (28%), other services (28%), educational services (28%), wholesale trade (26%), manufacturing (25%), health care (24%), and finance and insurance (24%). These industries may face a tougher time finding enough replacement workers as these older workers head toward retirement. At the same time, older workers looking to remain in the workforce may find job opportunities in these sectors if they have relevant experience.

Rural areas in Oregon also have a large concentration of older workers. In fact, the only counties with a smaller share of older workers than the statewide average are Washington County (21%), Multhomah County (21%), and Deschutes County (22%).

#### Workers with Barriers - Long-Term Unemployed:

Nearly a decade ago, in the early stages of the economic recovery from the Great Recession, the number of long-term unemployed Oregonians spiked to nearly 102,000, the highest number of record. Long-term unemployed are those who have been unemployed for at least six months. The longer an unemployed worker remains unemployed, the less likely they are to find a steady full-time job, and the more likely they are to leave the labor force. Researchers have found that long-term unemployment can lead to a decline in the workers' knowledge, skills, and abilities, making it harder for them to qualify for available jobs. Other studies show that employers discriminate against the long-term unemployed, making it less likely for an unemployed worker to receive an interview. These barriers to employment exist even in a strong economy.

The total number of unemployed Oregonians has been very low recently, hovering around 90,000 for the last three years. Long-term unemployment has also returned to levels last seen prior to the Great Recession. Over the past year, the number unemployed for longer than six months averaged 16,300 – less than one-fifth of the long-term unemployment peak reached in 2010. Still, even amidst the lowest unemployment rates on record in Oregon, one out of six unemployed Oregonians has been unemployed for six months or longer.

Although the number of long-term unemployed Oregonians has fallen below pre-recession levels, it took about seven years of economic recovery to reduce long-term unemployment to its present level. In addition to how persistent long-term unemployment was post-recession, it's unclear from the data whether most of the improvement came from long-term unemployed finding work, or if many left the labor force altogether.

#### Workers with Barriers - Race and Ethnicity:

The population of Oregon has grown to almost 4.2 million. Our median age is slightly higher than the national average, at 39.6 years, compared with 38.2 years across the U.S. More than nine out of 10 Oregonians ages 25 and over have completed high school or more education, a slightly higher rate than the 88 percent in the U.S. One-third of the Oregon population age 25 and over have at least a bachelor's degree.

Oregon's population has become more racially diverse over the last two decades, but continues to have a much larger share of the population reporting their race as "white alone" than the national average. In 2018, whites accounted for 84 percent of Oregon's population, compared with 72 percent of the population across the U.S. In Oregon, Asians made up close to 5 percent, blacks and African Americans accounted for 2 percent of the state's population, and other races made up the remaining 9 percent.

Oregon's population has also grown more ethnically diverse, as seen in the growth of the Hispanic population over the last two decades. By 2018, Hispanics and Latinos made up 13 percent of

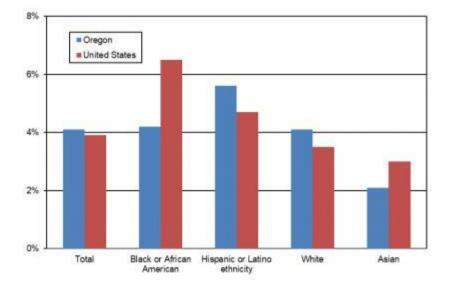
Oregon's population. This compares with 18 percent of the United States' population, indicating that Oregon still has a small Hispanic population relative to the national average.

Just about 10 percent of 2018 Oregonians were born in another country. Nationally, foreign-born residents make up 14 percent of the population. English is by far the most prevalent language in Oregon. In 2018, 84 percent of residents were accustomed to speaking only English at home. Nine percent of residents speak Spanish at home. Three percent speak an Asian or Pacific Island language at home.

Across racial and ethnic groups, unemployment rates have fallen to very low levels in recent years. While unemployment does vary across groups, the range in 2018 was within 2 percentage points of the overall average of 4.1 percent. Graph 5 shows the 2018 unemployment rates by race and ethnicity. The unemployment rate among people of Hispanic or Latino ethnicity was higher than average, at 5.6 percent. Unemployment among Oregon's Asian residents was lower than average, at 2.1 percent.

The Great Recession had a lingering effect on the unemployment rates of some groups. While overall unemployment peaked above 11 percent in 2009, the unemployment rate of Oregon's black and African American residents spiked to 21 percent by 2011 and stayed well above the overall rate through 2014. Oregon Hispanics and Latinos had a rate of 14.0 percent in 2009 and hit 13.5 percent again in 2011. Oregon's Asian residents, in comparison, never came close to double-digit unemployment rates throughout the Great Recession and the long recovery since.

Graph 6. 2018 Annual Average Unemployment Rate by Race and Ethnicity for Oregon Compared with the United States.



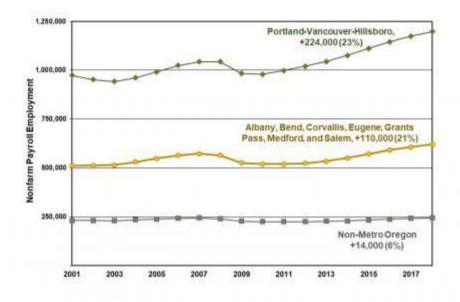
Source: Bureau of Labor Statistics, Current Population Survey

#### Workers with Barriers - Rural Workers:

It took rural areas of Oregon much longer than it took the Portland area to begin adding jobs following the Great Recession. By 2018 the number of jobs in rural Oregon had barely budged above the levels seen back in 2001; rural Oregon gained just 14,000 jobs, adding 6 percent. Meanwhile, job growth in Oregon's metro areas has been much stronger since 2001. Job growth in the Portland-Vancouver-Hillsboro metro outpaced the rest of the state, with a 23 percent gain between 2001 and 2018,

amounting to an additional 224,000 jobs. All other metro areas combined gained 21 percent, adding 110,000 jobs.

Graph 7. Nonfarm Payroll Employment Comparing the Portland Area, Other Oregon Metro Areas, and Combined Oregon Non-Metro Counties between 2001 and 2017. Rural Oregon is Adding Jobs at a Slow Pace.



Source: Oregon Employment Department, Current Employment Statistics

Job growth in some areas of rural Oregon is hampered by changes in the economy and an aging population. These are long-term slow-growth trends that were made worse by the Great Recession. Rural areas with less diverse industrial bases are also potentially more vulnerable to the effects of another recession.

Job growth trends have diverged at the county level. Oregon has 23 rural counties and 13 urban counties. There's tons of diversity among the 23 rural counties, and that shows in job growth trends. In general, more remote areas have had a tougher time growing, and are in some cases outright declining in terms of the job base, while rural counties in close proximity to metro areas have grown more quickly. Grant County and Harney County in far eastern Oregon have lost more than 10 percent of their job base since 2001. Wheeler, Crook, and Malheur counties have also lost a few jobs since 2001, but remain within 5 percent of their 2001 employment levels.

On the other end of the job growth spectrum, Morrow County employment grew 58 percent since 2001, while Hood River County gained 38 percent and Sherman County added 33 percent – all of these counties are along Oregon's northern border and the Columbia Gorge, linked to the prosperous Portland Metro by I-84. The north Oregon coast fared better than the central and south coast in terms of job growth – again showing the power of proximity to the state's largest metro area. Clatsop County employment grew 22 percent since 2001 and Tillamook added 16 percent. Lincoln gained 8 percent, while Coos added 7 percent and Curry gained 2 percent. In south central Oregon, on the state's southern border, Lake and Klamath counties' employment levels are virtually the same as in 2001.

Table 3. Oregon Job Growth by Area, 2001 to 2018.

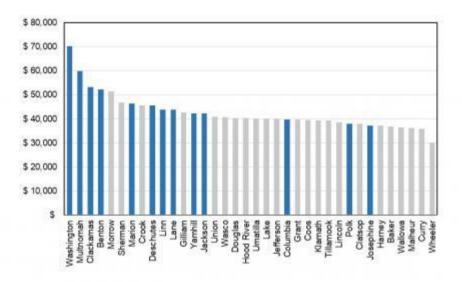
Area	2001	2018	Number Change	Percent Change
Oregon	1,605,200	1,911,700	306,500	19%

Area	2001	2018	Number Change	Percent Change
Metropolitan Areas				
Albany, OR MSA	40,220	46,020	5,800	14%
Bend-Redmond, OR MSA	53,740	84,920	31,180	58%
Corvallis, OR MSA	37,480	43,620	6,140	16%
Eugene, OR MSA	142,900	161,800	18,900	13%
Grants Pass, OR MSA	22,560	27,150	4,590	20%
Medford, OR MSA	74,960	88,730	13,770	18%
Portland-Vancouver-Hillsboro, OR-WA MSA	974,400	1,197,900	223,500	23%
Salem, OR MSA	139,300	168,500	29,200	21%
Non-Metropolitan Counties				
Baker	5,300	5,450	150	3%
Clatsop	15,500	18,900	3,400	22%
Coos	21,170	22,660	1,490	7%
Crook	6,200	5,930	-270	-4%
Curry	6,450	6,580	130	2%
Douglas	37,950	38,090	140	0%
Gilliam	745	790	45	6%
Grant	2,690	2,340	-350	-13%
Harney	2,580	2,300	-280	-11%
Hood River	8,680	12,000	3,320	38%
Jefferson	6,200	6,580	380	6%
Klamath	23,140	23,080	-60	0%
Lake	2,240	2,250	10	0%
Lincoln	17,280	18,600	1,320	8%
Malheur	12,240	11,860	-380	-3%
Morrow	3,120	4,920	1,800	58%
Sherman	645	860	215	33%
Tillamook	8,000	9,310	1,310	16%
Umatilla	28,370	28,240	-130	0%
Union	10,210	10,360	150	1%
Wallowa	2,280	2,540	260	11%
Wasco	8,980	10,280	1,300	14%
Wheeler	315	300	-15	-5%

#### Source: Oregon Employment Department

Average wages in rural Oregon are lower than in urban areas of the state. The combined average annual payroll in non-metro counties was just \$39,720, compared with \$54,772 in metro areas in 2018. Just four non-metro counties, Morrow, Sherman, Crook, and Gilliam, have average wages that are similar to metro areas. However, the average wages in these four counties are high due to very high wages for relatively few jobs. This increased the overall average without directly raising the wages of other workers. For example, the information sectors of Crook and Morrow counties include jobs at Internet data centers, and the high wages paid in that industry raise the overall county averages above wages in other rural counties.

Graph 8. 2018 Annual Average Wages for Each Oregon County. Average Wages are Much Higher in Most Metro Counties. Metro = \$54,772, Non-Metro = \$39,720.



Source: Oregon Employment Department

There tends to be fewer jobs per person living in rural Oregon than there are in urban areas, and a smaller share of the population in rural counties is involved in the labor force. The labor force participation rate is the share of the population age 16 years and older that is employed or unemployed. Over the last 20 years, labor force participation rates have been falling in Oregon and the U.S. as a larger share of the population reaches retirement age and fewer young people enter the labor force.

Figure 4. Map of Oregon Counties showing the 2018 Labor Force Participation Rates.



Source: Oregon Employment Department

These trends are particularly strong in many of Oregon's rural areas. Curry County has the lowest labor force participation rate in the state at 44.7 percent in 2018. That means fewer than half of the county's population age 16 and over was working or actively looking for job. Other counties with low labor force participation include Crook (48.4%), Coos (48.9%), Josephine (49.5%), and Lincoln (50.0%). Some rural counties have higher labor force participation rates. All of the four rural counties that had participation rates higher than the statewide rate of 62.3 percent were located along the Columbia River. These were Hood River (79.3%), Morrow (65.9%), Umatilla (65.0%), and Wasco (63.6%) counties.

Aging rural populations have a direct effect on the aging of the workforce, as shown by the share of the workforce that is age 55 years and over. Many of these workers are planning to retire in the next 10 years, taking their skills and experience with them, and this will impact employers unless they can recruit workers from other areas to sustain the size of their current workforce.

Area	Number of Workers 55	Percent of All	Area	Number of Workers 55	Percent of All
	and Older	Workers		and Older	Workers
Oregon	438,794	23%			
Wheeler	113	38%	Josephine	7,209	27%
Grant	656	32%	Malheur	3,506	26%
Wallowa	855	32%	Klamath	5,690	26%
Gilliam	234	32%	Hood River	3,360	25%
Lake	689	32%	Union	2,552	25%
Lincoln	5,191	31%	Jackson	22,218	25%
Harney	662	30%	Yamhill	8,833	25%
Curry	1,797	29%	Linn	11,399	25%

Table 4. Rural Counties have Higher Shares of Workers 55 and Over, 2018.

Area	Number of Workers 55	Percent of All	Area	Number of Workers 55	Percent of All
	and Older	Workers		and Older	Workers
Coos	6,338	29%	Marion	39,024	25%
Sherman	181	28%	Benton	9,354	25%
Tillamook	2,638	28%	Columbia	2,644	25%
Baker	1,484	28%	Lane	38,017	25%
Jefferson	1,744	28%	Umatilla	7,467	25%
Clatsop	4,603	27%	Polk	4,918	24%
Wasco	2,920	27%	Clackamas	39,960	24%
Crook	1,440	27%	Deschutes	17,742	22%
Douglas	9,594	27%	Multnomah	108,551	21%
Morrow	1,427	27%	Washington	63,755	21%

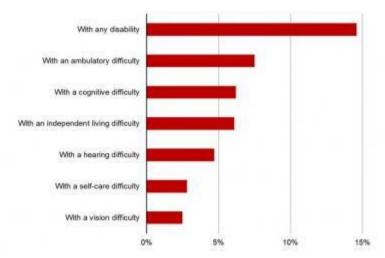
Source: U.S. Census Bureau, Local Employment Dynamics

Rural Oregon stretches across a vast area and encompasses a variety of industries and economic conditions. Areas of rural Oregon with industries meeting the current needs of the economy are thriving. Other areas of rural Oregon have experienced a long-term reduction in jobs, while the jobs that remain often pay lower wages. Going forward, nearly all of rural Oregon faces the challenges of an aging population and a relatively smaller workforce as fewer members of the communities participate in the labor force.

#### Workers with Barriers - Disability:

In Oregon, there were about 581,000 people with disabilities on average from 2013 to 2017, according to the American Community Survey. This represented roughly 15 percent of Oregon's civilian noninstitutionalized population. Among the population of working age, those 18 to 64, about 302,000 had disabilities. Older people are more likely to have a disability. In Oregon, 52 percent of individuals ages 75 years and older have a disability and about 6 percent of the population ages 5 to 17 have a disability. The first chart shows the frequency of types of disabilities for all Oregonians.

Graph 9. Oregon Disability Population by Type of Disability from 2013 to 2017.



Source: Oregon Employment Department and U.S. Census Bureau

According to the U.S. Bureau of Labor Statistics, the unemployment rate for people with disabilities was 8.0 percent nationally in 2018, more than twice that of people with no disability (3.7%). This national unemployment rate for people with disabilities was higher than for many other groups of people who have high historical rates of unemployment: African Americans (6.5% vs. 8.0%), Hispanics (4.7% vs. 8.0%), foreign-born workers (3.9% vs. 8.0%), and people without a high school diploma (5.6% vs. 8.0%). Teenagers ages 16 to 19 years did have a higher rate of unemployment (12.9%) than people with disabilities.

Among the population ages 18 to 64, about 113,000 Oregonians with disabilities were employed and 20,000 were unemployed on average between 2013 and 2017. About 170,000 were not in the labor force. There is a big difference in the employment rates between Oregonians with a disability and those without a disability. About 38 percent of Oregonians with disabilities were employed versus 76 percent of those with no disabilities. People who are neither employed nor unemployed are not in the labor force. About 56 percent of Oregonians with disabilities were not in the labor force versus 19 percent of those with no disabilities.

#### Skill Mismatches, Shortages, and Gaps:

In September 2018, the Oregon Workforce and Talent Development Board (WTDB), working with ECONorthwest and Program and Policy Insight, released the Oregon Talent Assessment. The purpose of the *Assessment* is to assess the market for skills from business and industry's perspective. Specifically, the *Assessment* serves as business and industry's determination of indemand occupations, skills, talent, gaps, and trends. Its goal is to elevate the understanding of Oregon's skills problem by creating common data and language that can be shared across employers, educators, and workforce intermediaries. The WTDB's intention is to update the *Assessment* every two years.

The 2018 Assessment drew on quantitative and qualitative research. It summarized key occupational and wage trends found in a variety of federal and state data sources and reviewed projections. The perspectives of employers were collected through surveys and focus group interviews. Employers' perspectives generally aligned with market data, and the report highlights the instances where they do not.

The 2018 Assessment's key findings:

- Most employers do not report, and data do not suggest, widespread gaps in basic skills. This
  report defines a skills gap as a widespread shortfall of basic skills that would be consistent
  with a broad failure of the education system. A majority (77 percent) of employers agreed that
  their applicants possessed the basic skills required for their vacant positions: the abilities to
  read for and locate information, to write for communication, and to apply mathematics. Those
  who identified deficiencies specified inadequate writing skills.
- 2. About half of employers report a shortage of occupational skills required for specific occupations—with problem solving and critical thinking at the top of the list. The Assessment characterizes a shortfall of hard skills—project management, problem solving, machine operation, software competencies, and the like—as a notable challenge in particular occupations. Respondents in the outdoor gear/apparel, construction, bioscience, food and beverage, and wood products sectors reported the biggest challenges, with the absence of critical thinking and problem solving as the lead deficiencies.
- 3. Employers signal a high demand for engineers, skilled tradespeople, and project managers. While industries have specific employment needs, there are occupational needs that exist across sectors. The most frequently cited occupations across industries include engineers, skilled trades, and project managers. Nearly all sectors are in need of engineers, with the type of engineer dependent on the sector. Electrical and mechanical engineers are in demand across sectors. Several interviewees across multiple sectors cited the need for managers to oversee complex business and technical operations or products. Applicants need a broad

range of skills, including data analysis, critical thinking, interpersonal and leadership skills, and knowledge of business operations.

- 4. Employers recruit out-of-state to meet talent needs. Several key stakeholders indicated that they needed to recruit and hire out-of-state to meet their employment needs for specific occupations: utility line workers, electricians, millwrights, engineers (particularly bachelor's or master's level mechanical, industrial, electrical, computer, and chemical engineers), UX/UI (user experience/user interface) managers, and middle-level project managers. With respect to recruiting electricians and millwrights, employers cited barriers to hiring out-of-state due to Oregon's strict licensing standards.
- 5. Interpersonal skills are lacking while also growing in importance. The skills are called by many different names: interpersonal, soft, essential, social. They are the skills associated with an individual's habits, personality, and character, including dependability, leadership, honesty, and the ability to work in teams. Only a narrow majority of employers (55 percent) agreed that applicants possessed the interpersonal skills required for their vacant positions. When employers were asked what skills applicants lacked, communication skills, motivation, dependability, and time management all elicited high responses.
  - a. The employers' responses are echoed in recent research that tracked skills associated with growing and shrinking occupations over the past three decades. Occupations that required a mix of high social and high math skills grew at the fastest rate followed by occupations that required high social skills. Occupations that required high math skills and low social skills shrank as a size of the labor market, while occupations that required low social and low math skills fared the worst of all. The conclusion: the labor market has been rewarding humans for performing tasks that computers cannot do.
- 6. Modest wage growth tempers declarations of widespread skill shortfalls. The traditional relationship between unemployment rates and wage inflation is broken in this economic expansion. Nationally, low unemployment rates would suggest an economy near full employment, which typically triggers higher wages and inflation concerns. In this business cycle, wages have yet to accelerate. The relatively modest wage growth makes economists question employers' calls of skill gaps and shortages.
  - a. Oregon's experience is somewhat different than the nation's. Recovery and wage growth at the state level has outpaced the U.S. average. However, Oregon's average wages are still below national levels. Pay in Oregon's rapidly expanding professional and business services sector, which increased at an annual rate of 4.2 percent between 2007 and 2017, could support a story of shortages. It's hard to find similar evidence in other sectors. Even in construction, where anecdotes of cost overruns are common, wage growth corresponds to broad economy averages. Employer survey responses align with this wage story. When asked how they overcome hiring difficulties, only 35 percent identified wage increases as a remedy.
- 7. Populations that remain outside the labor force, late in this economic expansion, warrant priority consideration under the forthcoming adult workforce goal. This economic expansion, at the time of publication, is the second longest in the post-World War II era. Yet labor force participation rates (i.e., the share of the population working or seeking work) are still below those recorded in the early 2000s and 1990s. For the expansion to continue, more people will have to be pulled off the sidelines. Sizable, traditional working age populations are still without work. Almost half have a high school degree or less. And among that population, half receive federal food assistance and 40 percent have children. These late-expansion, non-workers—especially those with limited education—are obvious candidates for a full suite of basic skills training, supportive work environments, and job search assistance programs.
- 8. Demography and automation play the leading roles in job projections. The Oregon Employment Department's recently released 10-year projections boil down to several broad

themes: an aging population will demand more healthcare and caregiving; automation will continue to erode employment in all sectors related to paper, from papermaking to publishing; today's low residential and commercial vacancy rates (and high prices) suggest strong growth in the construction sector; and the government—at all levels—is positioned for slow growth. Five of the top ten fastest growing occupations are health-related: physician assistants, home health aides, nurse practitioners, health specialties teachers, and health diagnosing practitioners. With the leading edge of the Baby boom generation entering their mid-70s, these projections seem like a reasonable scenario.

- a. The scope and pace of technological progress is the big question mark. In the near term, most observers anticipate continued destruction of routine work tasks, with disproportionate impacts in food service, office and administrative, sales, and production occupations. Most affected occupations won't disappear entirely, but the nature of the job will change, and workers will have to adapt accordingly. Artificial intelligence experts anticipate even more disruption and see technology outperforming human labor at higher points on the skill ladder (e.g., disease diagnosis, creative writing, and clothing design). The trends warrant close monitoring.
- 9. Employer forecasts of talent needs are common, short-term, and largely unshared. Almost all (97 percent) survey respondents and the majority of interviewed stakeholders note that they primarily use internal company data and analysis to guide forecasting and planning. Most industry stakeholders suggest forecasting timeframes ranging between 3 and 12 months, with ongoing weekly discussions. Respondents described rapidly changing information and the need to be responsive and nimble to changing conditions. The majority of stakeholders indicate that they limit their forecasting analysis to internal use only and do not share with other firms, training providers, or educational or workforce institutions.
- 10. Employers report progress on strengthening the talent supply chain through externships, internships, apprenticeships, and reinvigorated career technical education programs. Respondents described a number of recruiting mechanisms designed to attract prospective employees at a younger age. Educator externships expose K-12 teachers, administrators, and counselors to the work they do, and the skillsets required to be successful in these careers. This in turn influences how young people learn about workplace skills and engage with career path options. CTE programs are expanding in high schools, allowing students to get hands-on experience in a wider variety of career options and skill areas. Industries are working closely with post-secondary institutions to develop and support curricular options to train their future workforce. Businesses and education institutions are supporting work-based learning opportunities for future potential employees, such as apprenticeships and internships. Industries are collaborating with associations and workforce development to invest in augmenting displaced workers' skillsets to support them in transitioning to careers in new sectors. Some industries are working to diversify their workforce by targeting women, minorities, and veterans in their training and recruitment efforts.

# 2. Workforce Development, Education and Training Activities Analysis

The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the State, to address the education and skill needs of the workforce, as identified in (a)(1)(B)(iii) above, and the employment needs of employers, as identified in (a)(1)(A)(iii) above. This must include an analysis of—

## A. The State's Workforce Development Activities

Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and required <sup>6</sup> and optional one-stop delivery system partners.<sup>7</sup>

[6] Required one-stop partners: In addition to the core programs, the following partner programs are required to provide access through the one-stops: Career and Technical Education (Perkins), Community Services Block Grant, Indian and Native American programs, HUD Employment and Training programs, Job Corps, Local Veterans' Employment Representatives and Disabled Veterans' Outreach Program, National Farmworker Jobs program, Senior Community Service Employment program, Temporary Assistance for Needy Families (TANF) (unless the Governor determines TANF will not be a required partner), Trade Adjustment Assistance programs, Unemployment Compensation programs, and YouthBuild.

[7] Workforce development activities may include a wide variety of programs and partners, including educational institutions, faith- and community-based organizations, and human services.

## B. The Strengths and Weaknesses of Workforce Development Activities

Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A), directly above.

## C. State Workforce Development Capacity

Provide an analysis of the capacity of State entities to provide the workforce development activities identified in (A), above.

#### Oregon's Workforce Development Activities

In 2017, as part of continued efforts to implement WIOA, the Workforce System Executive Team (agency strategic and operational leaders for workforce programs and services) and the Oregon Workforce Talent and Development Board (WTDB) adopted updated WorkSource Oregon (WSO) Operational Standards as a system-wide expectation for service delivery. Partners came together to further integrate Department of Human Services Vocational Rehabilitation and Self-Sufficiency employment and training programs, Oregon Commission for the Blind, as well as Adult Basic Education funded through WIOA title II with WIOA core programs.

New programs have been incorporated into Oregon's Combined State Plan including Trade Adjustment Assistance for Workers carried out by the Oregon Employment Department, Employment and Training Activities carried out by the Department of Housing and Urban Development, and the Senior Community Service Employment Program carried out by the Department of Human Services. The intent of their inclusion is to deepen the services available to customers and to expand the service delivery system. These new programs have not yet been fully integrated into WSO Centers.

Partners at both state and local levels strive to exceed these standards and pursue further integration of: staff, resources, resource management, customer enrollment and service delivery. The standards are based on premise that partners will continually work together to improve the system, engage new partners, and better serve Oregon job seekers, workers, and businesses.

#### Core Activities in the Workforce Development System:

Exploratory Services are provided to determine where customers are on their journey to employment and/or training and where they want to be in the future. Each customer completes a one-on-one "Welcome Conversation" with staff to assess individual need, determine program eligibility, and develop an individual service plan which may include referral to services and training programs as relevant and appropriate. The intent is to listen to customers' needs and guide them toward their next steps based on individual needs rather than a one-size-fits-all approach of requiring formal assessments and processes for all customers coming into the center. At least one Exploratory Service will be provided to each customer at each visit, resulting in all customers receiving a value-added service prior to their departure. Customers needing to register with the labor exchange system, or interested in pursuing Career or Training Services will be provided a customized one-on-one engagement including specific next steps. Staff provides LMI and referral to appropriate resources and partner services.

Career Services are those services that assess a person's readiness to work and provide employment statistics information to inform career goals and opportunities for advancement in occupations. Key values provided to jobseekers through provision of Career Services are to ensure they know their skills, know how their skills match the labor market, and know which tools are available for them to acquire the skills needed to be competitive. Career services include: Eligibility determination; orientation; job search; placement assistance; career counseling; the provision of information on in-demand industry sectors and occupations, non-traditional employment and local labor market information. Effective Career Services rely on assessment, development of a focused Individual Employment Plan (IEP), career planning and skills validation. Referrals to and coordination of activities with other programs and services will be provided as they relate to the career service needs of customers.

Individuals determined to be in need of training to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment may be eligible to receive Training Services. Local areas may also prioritize training connected to sectors and target populations as part of the local plan and priorities of the Governor of Oregon, and will create opportunities for remediation. In Oregon, individuals with barriers to employment includes those defined under WIOA (see definitions in Appendix C) as well as veterans, unemployed workers, and youth. An IEP is required for all customers accessing Training Services. The IEP will be used to inform training needs, as well as to verify if customers have the skills to be successful in training prior to enrollment into the training program. The IEP must include: clear employment goals, demonstration that selected training is directly linked to employment opportunities in the local area or in an area to which a participant is willing to relocate, timelines attached to the set goals, and a budget that has accurate and clear costs and funding sources for the planned training activities and related costs that support successful completion of training.

Comprehensive Business Services are offered through WSO centers to ensure that WSO is providing a value-added service to businesses and is supporting local sector strategies and investment priorities. The most important Business Service WSO provides is connecting employers to qualified candidates. Business services are responsive to business and workforce needs of the local area, how these align with local sector strategies, and protocols to access recruitment processes and other services. All WSO centers will provide appropriate recruitment and other business services on behalf of employers, including small employers, in the local area. Business services include: recruitment services, customized training, incumbent worker training, job postings, incentives, and rapid response.

#### Priority Activities in the Workforce Development System - Industry Sector Strategies:

All Local Workforce Development Boards identify targeted sectors as part of their planning process. LWDBs develop service priorities and dedicate resources based on local plans and investment strategies. Strategies by LWDBs focus on demand-side aspects including connections to economic development and regional priorities, and the engagement of employers and industry groups while strategies by WSO will focus on the supply-side elements of a sector strategy, utilizing sector-based career pathways and training programs to prepare and connect qualified jobseekers and workers to high-demand sector-based occupations and careers.

#### Priority Activities in the Workforce Development System - Work-Based Learning:

WIOA aims to create job-driven centers that focus on work-based learning, industryrecognized/postsecondary credentials, career pathways, and enhanced connections to registered apprenticeship. Work-Based Learning (WBL) as defined in Oregon's draft CTE State Plan is structured learning in the workplace or simulated environment that provides opportunities for sustained interactions with industry or community professionals that foster in depth firsthand experience of the expectations and application of knowledge and skills required in a given career field. It includes apprenticeship, on-the-job training (OJT), clinical/practicum/internships, school-based enterprises, workplace simulation/technology-based learning, service-learning, and cooperative work experiences that are linked to careers.

#### Priority Activities in the Workforce Development System - Adult Attainment:

In 2018, the Higher Education Coordinating Commission (HECC) and the Workforce and Talent Development Board (WTDB) established a new statewide adult education and training attainment goal. The broader purpose of the Adult Attainment Goal is to drive improvements in Oregon's educational and workforce systems.

#### Support for Workforce Development System Activities - Support for Job Seekers:

UI claimants are a priority population for receiving re-employment services. Most Unemployment Insurance (UI) claimants are required to attend an in-person orientation with Employment Services staff. This process includes a one-on-one meeting with a workforce representative who reviews the customer's registration to ensure a quality profile for job matching, provides an overview of workforce services and training programs, provides customized labor market and career information for informed decision making, and refers the customer to reemployment and training services including job-finding workshops as appropriate. State analyses indicate that early intervention with claimants results in a significant saving in UI benefit payments.

Another important population group served by WSO is SNAP recipients. Oregon has a large population of SNAP recipients. In April of 2019, for example, 601,486 people in 352,956 households were served through the SNAP program in Oregon. This population group includes low-income families and individuals, the elderly, and people with disabilities. SNAP recipients are eligible to participate in the SNAP Employment and Training (SNAP E&T) program.

Participants in the SNAP E&T program receive a one-on-one orientation to the employment and training services available through WorkSource Oregon, including the SNAP Provider Network, which includes the Oregon Employment Department (OED), WSO partners and community-based organizations that receive SNAP E&T funding.

OED staff serve SNAP participants through a case management model of customer service which includes an orientation, assessment and the development of an individualized case plan. The plan is developed in partnership with the participant and lays out employment goals and next steps for a successful job search. SNAP participants are also eligible for support services to assist with transporting, clothing, tools, training and other job-finding expenses. Following placement, participants are then eligible for retention services to help ensure a successful and positive transition to employment. Retention services may include one-on-one coaching or support services as described above.

#### Support for Workforce Development System Activities - Integrated Performance Measurement:

Integrating data across information systems is key to local service delivery and is critical for maximizing accountability and transparency. The state remains committed to exploring ways to better link information systems and offer "no wrong door" access to all customers.

Data from Oregon's system–wide performance measures continues to be available for the employment related indicators, basic skills attainment, and Temporary Assistance to Needy Families (TANF) caseload management. Oregon's cross–system outcomes accountability system, Performance Reporting Information System (PRISM), gathers demographic data on customers served by nearly all workforce partners, ensuring analysis and evaluation can occur based on customer cohorts (e.g., racial/ethnic minority status, age group, or educational attainment level). Many results are available at a statewide level, by agency/partner program, and/or by local area – or by combinations. These system–wide performance data are available at www.qualityinfo.org/pm.

PRISM was established to collect, analyze, and report on workforce development services, customers receiving these services, and employment outcomes after receiving services. PRISM measures how effective Oregon's workforce agencies are at helping people find and keep jobs and improve wages. Information and data is updated regularly, and this, combined with the ability to filter results and compare trends over time, gives program managers, stakeholders, and even the general public the ability to view, analyze, and evaluate various performance–related measures across Oregon's workforce system.

#### Oregon's Strengths and Weaknesses of Workforce Development Activities

#### Strengths:

The Oregon Workforce and Talent Development Board (WTDB) approved a new strategic plan in 2019. The 2020-21 Strategic Plan reflects several shifts that are expected to be significant strengths. First, the Strategic Plan is more focused. The one-page format provides for greater transparency and accountability. Second, its two-year timeframe is much more nimble providing greater opportunity to respond to changes in the economy and workforce. Third, it was developed by a board with full membership reflecting most of the important industry sectors in Oregon with engagement by many partners. Finally, it will be implemented at the board level by teams focused on each of the five imperatives (goals) included in the plan and task forces focused on priority issues such as artificial intelligence, licensing, self-sufficiency, essential workplace skills. Each of these teams and task forces are led by business members on the board.

Oregon's workforce development system includes more than state agencies and local delivery at WSO centers. One of the greatest assets of Oregon's workforce system is a culture of strong communication and partnership between programs that goes well beyond the required partners in the WorkSource Oregon centers. Processes, where feasible, have been built to increase cooperation and integration, across the partners included in Oregon's Combined State Plan as well as many others such as Oregon's network of 17 community colleges, 17 adult basic skills programs, nine local workforce development boards/areas, community-based organizations, and other partnerships.

Strong and expanding partnerships and increasing alignment are driven by Oregon's priority for continuous improvement in the workforce development system. Diminishing federal resources have presented challenges that, in part, have sparked state and local innovation and resource leveraging. One such innovation is the creation and funding of the WTDB's Strategic Innovation Grants (SIGs). SIGs are now in their second round providing for potential partners (grantees) outside of the traditional workforce development system and focusing on innovation that supports the WTDB's Strategic Plan.

Another key strength is the membership and staff of the local workforce development boards who provide a solid convening table for labor, economic development, elected officials, education, workforce development and human service providers to create local solutions in response to the needs of the workforce and business. This is clearly evident in the application of industry sector partnerships across the state particularly Next Generation Sector Partnerships[1]. One example is a Next Gen tech sector partnership coordinated by the Lane Workforce Partnership and the Technology Association of Oregon that has resulted in a new all-time high number of tech companies at 503, up from 418 when the partnership started this work in 2015, and a new all-time high in terms of average annual wage at \$79,667, up from \$74,368, and nearly double that of other industries.

As described in the Oregon's Workforce Development Activities section, one-stop partners across all workforce areas developed and recently updated the WorkSource Oregon Operational Standards for all WSO centers and that apply to all WorkSource staff, not to any particular funding or program. Not only do the standards provide service consistency, they also demonstrate active collaboration between programs across workforce areas. Similarly, state funding for the Labor Management Information (LMI) function has allowed Oregon to build and maintain a robust suite of labor market information and services, including local area analysis, information sharing, outreach and strong partnerships with workforce partners. LMI informs sector strategies, career planning, training decisions, business engagement and placement services.

The WorkSource Oregon mission is to effectively respond to workforce challenges through highquality services to individuals and businesses, resulting in job attainment, retention and advancement. It is through strong components of Oregon's workforce system that Oregon is able to strive to reach our vision of communities where the employment needs of jobseekers and businesses are met by solutions delivered effectively through engaged workforce system partners. Another key strength of the WSO system are Local Leadership Teams. Local Leadership Teams (LLTs) are convened by Local Workforce Boards and are the mechanism used to manage the implementation of the local WSO system. This includes coordination of services, programs, funding streams, processes and initiatives among WSO partners to ensure accountability and alignment in support of a seamless public system.

Another strength is the state's 2017 implementation of the SNAP Employment and Training (SNAP E&T) program in WorkSource Oregon (WSO) centers. This program is now a nationally recognized model and has been instrumental in helping SNAP participants access services available through WIOA. WSO staff serve SNAP participants through a case management model of customer service. This model provides each SNAP participant with a workforce professional who guides, motivates, and supports them in their process of obtaining employment. WSO staff assess the participant's skills, interests, goals and challenges in order to provide the appropriate resources (including support services to assist with transportation, clothing, certifications, licenses, training, etc.) and tools to support the participant. This assessment is captured in the form of an Opportunity Plan which lays out the steps needed for them to achieve their stated employment goal. Participants are also introduced to community-based organizations outside of WSO that receive SNAP E&T funding. Together, this creates a SNAP E&T Provider Network which can help staff connect participants with programs that serve special populations such as homeless youth, refugees and those in recovery and reentry programs. In FFY 2019, OED served 30,287 SNAP participants. In FFY 2020, OED is proposing to serve 28,033 participants. Program goals include placing 40% of STEP participants at \$14.00 per hour in partnership with the state's regional business services model, which provides customized job placement assistance to businesses.

Another strength of workforce development is the coordination and cooperation of Trade Act, Unemployment Insurance, and Dislocated Worker staff to assist customers in finding employment and accessing available training programs as appropriate.

Oregon's draft CTE State Plan, responding to the authorization of the Strengthening Career and Technical Education for the 21st Century Act (Perkins V), addresses the need for the state to strive to align the work across agencies and departments. It integrates with the broader priorities and goals in other Oregon plans to orchestrate collective effort and investment in Oregon's future. The CTE State Plan was built in alignment with the principles, commitments, and priorities laid out in the Governor's Future Ready Oregon Plan, Oregon's K-12 Education Plan, the Higher Education Coordinating Commission's Strategic Priorities, the Workforce and Talent Development Board's Strategic Plan, and the Oregon STEM Education Plan. Even though career and technical education programs are not a part of Oregon's Combined State Plan, there is a joint commitment in the draft CTE State Plan to ongoing dialogue and partnership among offices and teams implementing the many interwoven strategic initiatives across the state. This commitment is shared in the workforce development system and is expected to result further alignment, continuous communication, mutually reinforcing activities, and shared measurement of outcomes, and work toward cross-agency funding opportunities. Finally, the draft CTE State Plan has a strong focus on work-based learning.

Business services are continually evolving and improving. At the start of 2013, WorkSource Oregon began offering an enhanced business services model. Employers select this option when they want a deeper partnership with their business services staff member. To build a successful relationship, WSO staff begins by conducting on-site employer visits prior to the start of the recruitment, to better understand the business culture and the business recruitment needs, which allows staff to refer qualified candidates in a timely manner with an increased level of success. The employer then has a smaller, more highly qualified applicant pool, which saves them time and money.

This model has proven successful in building high-functioning business services teams, which serve as a single point of contact for businesses. In turn, this has helped improve communication and coordination of service delivery between workforce partners and allowed for more streamlined and targeted placement of WorkSource Oregon customers, particularly those with barriers to employment such as veterans, claimants, dislocated workers and other special populations. This model has also helped local areas align business services efforts and ensure that workforce investment activities meet the needs of businesses and support economic growth in each area. Enhanced communication, coordination and collaboration among businesses, economic development, service providers, business team members, and the local Boards will help leverage and align collective resources.

This model helps us to understand how each partner works with businesses and how we can communicate our efforts better with each other. Align business services within region to create efficiency, leverage employer contacts, and enhance the connection between WorkSource business services and Local Board's sector partnerships. This model, currently operating in five of the nine workforce regions with plans to implement statewide by 2021, has significantly improved the value and impact of business services by lowering an employer's recruitment and turnover costs. National and state level studies show that when the right person is hired, the employer saves roughly 50 percent of the new hire's salary because of lower turnover and training costs. Using this model, WorkSource Oregon directly placed 2,935 workers into enhanced job listings in Program Year 2018. Using a very conservative net savings to the employer of \$10,816 per hire, the service saved Oregon businesses \$31.7M in recruitment and turnover costs.

Oregon has a strong bricks and mortar presence. Roughly 30 percent of facilities are owned by the state, which have lower operational costs when compared to leasing. The use of non-federal funds provides additional flexibility in locating offices relative to community needs, particularly important given Oregon's rural expanse. Local elected officials across rural communities depend on public workforce services to support their economic and education objectives.

The Oregon Employment Department's Workforce and Economic Research Division provides accurate, reliable, and timely information about Oregon's state and local labor markets. The goal is to provide quality information that helps our customers make informed choices. Workforce development policy makers are a key Research customer group, particularly serving the labor market information needs of state and local workforce development boards. With the advent and now widespread use of the internet, the more "traditional" aspects of labor market information are largely made available online; allowing staff more time to focus on custom analysis and answering challenging questions about the labor market.

#### Weaknesses:

The disparate systems used by various programs and entities to track customers, services, and outcomes continues to make consistent reporting and data sharing across programs challenging. Most programs report performance outcomes separately, and getting a system-wide view of performance across all WIOA-funded programs requires additional manual efforts. This continued "silo-ing", even though a product of the existing technological infrastructure, upholds feelings of disconnection between the programs funded under WIOA's various titles – although staff from all programs meet regularly and support efforts to integrate, share data, and develop collaborative initiatives.

Oregon continues to face challenges in establishing infrastructure funding agreements (IFAs) as prescribed by WIOA. Some of the methodologies proposed through federal guidance and the Final Rules seem to run counter to principles and agreements that Oregon's workforce system partners have in place, straining relationships that were otherwise solid, and requiring substantial staff time and effort to address.

#### Oregon's Workforce Development Capacity

#### Workforce and Talent Development Board:

The Workforce and Talent Development Board (WTDB) advises the Governor and legislature on workforce policy and plans, and contributes to the economic success of Oregon by aligning state workforce policy and resources with education and economic development; promoting a proactive, flexible and innovative talent development system; and, by holding the workforce system accountable for results, to ensure Oregonians develop the skills they need to sustain rewarding careers and businesses have the talent they need to be competitive.

The WTDB advises the Governor and legislature on workforce policy and plans, and contributes to the economic success of Oregon by aligning state workforce policy and resources with education and economic development. The board also provides strategic, investment recommendations on workforce and talent development. The board promotes a proactive, flexible and innovative talent development system to ensure Oregonians develop the skills they need to sustain rewarding careers and businesses have the talent they need to be as competitive as possible.

#### Local Workforce Development Boards:

Local Workforce Development Boards (LWDBs) are designated to develop local workforce plans, and to direct and prioritize funding toward workforce development activities, and help shape how services are delivered in the local WSO System. They convene economic development and other partners to create resources for workforce development activities in response to the needs of jobseekers and local business. The LWDBs, as neutral independent brokers of workforce services, purchase contracted workforce services that are provided through the WSO centers to support talent development, job creation, income progression, business competitiveness, and expanded opportunities for citizen prosperity. The LWDBs certify WorkSource Oregon centers.

Local Workforce Development Boards provide a convening table for labor, economic development, elected officials, community colleges, K-12 education, workforce development and human service providers to create community-based solutions to workforce challenges and efficiently address local labor market needs and statewide priorities. They lead employer engagement to promote business representation, develop linkages, implement effective strategies and ensure that workforce investments support the needs of employers. They expand private-public partnerships with an integrated workforce system to ensure WSO centers meet the needs of the community, and they partner with the Governor's Regional Solutions Teams to identify and leverage opportunities to expand job creation and incent job growth. They negotiate local title I performance measures and conduct program oversight to ensure appropriate use, management and investment of workforce resources.

#### U.S. Department of Housing and Urban Development Employment and Training Activities:

The U.S. Department of Housing and Urban Development (HUD) provides housing assistance to lowand moderate-income households in the state of Oregon. HUD rental assistance can be leveraged to support job and education training by residents receiving rental assistance. The housing assistance programs are administered primarily by local public housing authorities (PHAs). Housing assistance is also provided to state and local governments in the form of Community Development Block Grants (CDBG) or via competitive funding via the Continuum of Care (CoC) Homeless grants.

Creating economic opportunities and jobs are among the key CDBG activities funded by many Entitlement Jurisdictions. CDBG grantees can fund job training programs that provide skill-building classes to employees or potential employees. This activity can be undertaken as a part of a special economic development project as a public service; or as a part of microenterprise assistance package to the owner of a micro business for his or her employees.

Section 3 of the HUD Act of 1968, requires that recipients of certain HUD financial assistance, to the greatest extent possible, provide training, employment, contracting, and other economic opportunities to low- and very low-income persons, especially recipients of government assistance for housing, and to businesses that provide economic opportunities to low- and very low-income persons.

#### **Department of Human Services Self-Sufficiency:**

The Department of Human Services Self-Sufficiency Program (DHS-SSP) provides assistance for low-income families to promote family stability and help them become self-supporting. They provide access to the Supplemental Nutritional Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF) and TANF-related programs, Employment Related Day Care (ERDC), Temporary Assistance for Domestic Violence Survivors (TA-DVS), Refugee Programs, and Youth Services Programs. Workforce programs provided by DHS include the SNAP employment and training program as well as the Job Opportunity and Basic Skills (JOBS) program for TANF participants.

DHS-SSP provides eligible Oregonians with access to self-sufficiency employment and training services in Oregon's comprehensive WSO centers and many affiliate WSO sites, as well as at DHS branch locations and contracted partner sites. DHS-SSP providers work with WSO partners to coordinate provision and funding of employment and job training services to shared customers. DHS-SSP is a required partner in the WorkSource Oregon system.

#### **Department of Human Services Vocational Rehabilitation:**

Department of Human Services Vocational Rehabilitation (DHS-VR) helps Oregonians with disabilities gain and maintain employment through counseling, specialized training and new skill development. This includes helping youth with disabilities transition from the educational system to the workforce as they become adults, helping employers overcome barriers to employing people with disabilities, and partnering with other state and local organizations that coordinate employment and workforce programs to effectively meet the needs of people with disabilities. Employment helps people with disabilities become more self-sufficient, involved in their communities, and live more engaged, satisfying lives.

The VR program insures specialized services are provided by skilled Rehabilitation Counselors who deliver direct client services in VR field offices, local DHS offices, and select WSO sites. Vocational Rehabilitation Counselors conduct comprehensive assessments to evaluate vocational potential, including diagnostic and related services necessary to outline the nature and scope of services necessary for people with disabilities to gain and maintain employment. Vocational counseling and guidance builds on the assessments and clearly identifies appropriate career goals and career paths to obtain those goals. WSO partners often assist VR Counselors with shared clients to insure access to these career paths and goals. VR is a core partner in the implementation of WIOA and is committed to improving access to the Workforce System for Oregonians with disabilities.

#### Department of Human Services Senior Community Service Employment Program:

Oregon's WIOA State Plan for 2020 -2023 includes the Department of Human Services Senior Community Service Employment Program (SCSEP) for the first time. Greater alignment with the WTDB and local workforce development boards (LWDBs) is expected over the course of this Plan. SCSEP is already a valuable partner in many WorkSource Oregon centers through Easter Seals and Experience Works and these partnerships will expand over the course of this Plan. SCSEP maintains strong relationships with local employers and LWDBs to enhance collaboration with workforce partners and promote employment opportunities for older workers.

As pointed out in the Older Workers section of this Plan, older workers are a fast growing segment of the population and face many barriers to employment. SCSEP will be a key stakeholder in policy recommendations focused on addressing current and future barriers.

#### Higher Education Coordinating Commission:

The Higher Education Coordinating Commission (HECC) is a state agency/commission that develops and implements policies and programs to ensure that Oregon's network of colleges, universities, and pre-college outreach programs are well-coordinated to foster student success. It is responsible for policy development and program oversight of workforce development initiatives funded under WIOA titles I and II, contributing leadership and resources to increase the skills, knowledge and career opportunities of Oregonians. The HECC provides staffing to the Oregon Workforce and Talent Development Board.

On behalf of the Governor, the Office of Workforce Investments (OWI) implements and oversees Oregon's WIOA title I implementation, compliance, and funding distribution. The Office of Community Colleges and Workforce Development (CCWD) oversees and supports WIOA title II adult education and literacy programs, investments, and activities; as well as post-secondary career and technical education authorized under the Carl D. Perkins Vocational and Technical Education Act. In addition, CCWD also administers the High School Equivalency Program which includes the GED® program.

#### **Oregon Commission for the Blind:**

The Oregon Commission for the Blind (OCB) is a state agency/commission that assists Oregonians who experience vision loss to develop independent living skills and achieve positive employment outcomes. OCB works with businesses to help them increase diversity, develop assessable worksites and obtain/retain talented employees.

OCB provides individuals who experience vision loss with services including, although not exclusive to, counseling and skills training that allow them to obtain, retain, or further employment goals. Individuals may access services at any OCB office and/or work with a counselor/instructor in another location including a WorkSource Oregon center. OCB works with other agencies from which the client is obtaining services when appropriate.

#### **Oregon Employment Department:**

The Oregon Employment Department (OED) provides a public labor exchange connecting job seekers with employers. The OED supports economic stability for Oregonians and communities during times of unemployment through the payment of unemployment benefits, serves businesses by recruiting and referring qualified applicants to jobs, provides resources to diverse job seekers in support of their employment needs, and develops and distributes quality workforce and economic information to promote informed decision making.

OED provides a large portion of staffing and physical infrastructure for the WorkSource Oregon (WSO) system, and is the primary delivery mechanism in the aligned service delivery model.

OED's Title III labor exchange program has demonstrated sufficient capacity to provide service. However, non–federal funding plays a major role in meeting Oregon's labor exchange needs. Oregon's ability to maintain these services at the level currently provided is contingent upon receiving a similar level of state funding in the future.

Analysis has suggested that providing the capacity for extensive labor exchange and reemployment services to UI claimants (nearly 170,000 in PY 2014) strengthens the integrity of Oregon's UI Trust Fund by reducing the duration of UI claims by over 1 week per claim, which saved employers tens of millions in tax dollars.

#### Oregon Employment Department Trade Adjustment Assistance:

The Trade Adjustment Assistance (TAA) Program is a federal entitlement program providing benefits and services to eligible U.S. workers who have lost or may lose their job as a result of foreign trade. TAA Program benefits and services include case management services; reemployment services; job search allowances; relocation allowances; retraining benefits to include classroom, on-the-job, or apprenticeship training; wage subsidy for workers 50 and older; Health Coverage Tax Credit (HCTC); income support in the form of Trade Readjustment Allowances (TRA).

The TAA Program was established under Chapter 2 of Title 2 of the Trade Act of 1974. The 1974 Act has been amended in 2002, 2009, 2011, and 2014. The most recent amendment is The Trade Adjustment Assistance Reauthorization Act of 2015. The TAA Program is anticipated to be reauthorized with new legislation in 2021.

TAA staff work closely with all Workforce Innovation and Opportunity Act (WIOA) partners, such Wagner-Peyser, to provide employment and training services to Trade affected workers.

[1] Next Generation Sector Partnerships at nextgensectorpartnerships.com, Materials are © 2019 [NEXT GEN SECTOR PARTNERSHIPS]. ALL RIGHTS RESERVED.

## b. State Strategic Vision and Goals

The Unified or Combined State Plan must include the State's strategic vision and goals for developing its workforce and meeting employer needs in order to support economic growth and economic self-sufficiency. This must include—

## 1. Vision

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

## 2. Goals

Describe the goals for achieving this vision based on the analysis in (a) above of the State's economic conditions, workforce, and workforce development activities. This must include—

(A) Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment<sup>8</sup> and other populations.<sup>9</sup>

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

[8] Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; eligible migrant and seasonal farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families Program; single parents (including single pregnant women); and long-term unemployed individuals.

[9] Veterans, unemployed workers, and youth and any other populations identified by the State.

## 3. Performance Goals

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

## 4. Assessment

Describe how the State will assess the overall effectiveness of the workforce development system in the State in relation to the strategic vision and goals stated above in sections (b)(1), (2), and (3) and how it will use the results of this assessment and other feedback to make continuous or quality improvements.

#### Oregon's Vision and Imperatives

The Oregon Workforce and Talent Development Board's (WTDB's) vision is *equitable prosperity for all Oregonians*. To realize this vision, the WTDB advances Oregon through meaningful work, training, and education by empowering people and employers.

In today's increasingly complex and technologically-advanced economy, the pathway to meaningful work must include a broad array of initial and ongoing post-secondary education and training opportunities that include 2- and 4-year degrees at colleges and universities and also apprenticeships, industry-recognized certificates, licenses, and others that are supported by adult basic skills education and supportive services as needed.

All of these must credentials of value empowering both individuals and Oregon employers. In order to be a credential of value for an individual, the credential must be backed by substantial job opportunities connected to the credential, clearly identified competencies connected to expected job opportunities, self-sufficient wages or a pathway to self-sufficiency, and stack-ability to additional education or training. Employers must be a vital part of curriculum development and delivery to ensure that the credential reflects their current needs accurately and they must have confidence in the mastery of the competencies of the credential holder.

The WTDB will accomplish its vision by:

- Leading and communicating a long-term vision for Oregon that anticipates and acts on future workforce needs;
- Advising the Governor and the legislature on workforce policy and plans;
- Aligning public workforce policy, resources, and services with employers, education, training and economic development;
- Identifying barriers, providing solutions, and avoiding duplication of services;
- Promoting accountability among public workforce partners; and
- Sharing best practices and innovative solutions that are scalable statewide and across multiple regions

Essential to realizing the WTDB's vision, five Imperatives are identified by the WTDB and communicated to state and local partners and stakeholders. These are:

- Create a culture of equitable prosperity;
- Increase understanding and utilization of the workforce system;
- Identify and align strategic investments;
- Position Oregon as a national leader; and
- Create a Board culture that is resilient and adaptable and flexible to a changing economy

The choice of Imperative instead of Goal is deliberate to communicate increased importance among partners in the workforce development system and provide a focus on accountability.

#### Create a culture of equitable prosperity:

Equity is a vital theme to the WTDB's vision. There is an understanding that some Oregonians have been left behind or left out through historical and systemic inequities and biases. Despite this understanding and significant intentional effort to address equity, there is still much work to be done. Key focus populations include individuals with barriers to employment, consistent with WIOA, and also include rural Oregonians.

#### Increase understanding and utilization of the workforce system:

This recognizes that historically the workforce system was somewhat narrowly defined. WIOA requires a broader definition and the inclusion of many more partners and stakeholders. However, there is still not sufficient awareness by users including individuals, employers, stakeholders/organizations, and local workforce development boards. Expanding and communicating the definition of the "system" to better reflect Oregon's current and future needs is necessary so that the WTDB can better coordinate and streamline Oregon's workforce system so job seekers and employers find what they need more efficiently.

#### Identify and align strategic investments:

As the definition of the workforce system expands, the resources available to invest in users of the system, including those that support underrepresented populations and those with barriers to employment, increases. Critical and underutilized resources are public-private partnerships. The expansion of public-private partnership investments may be focused on work-based or career-connected learning and also supportive services to address challenges with housing, childcare, transportation, and others. Employers see these as barriers to recruitment of skilled workers and affect individuals who see these as barriers to education and training and to meaningful work.

#### Position Oregon as a national leader:

The WTDB is committed to being innovative role models who set and share best practices. This requires courageous risk-taking to influence and persuade action throughout the workforce system. Oregon's new Adult Attainment Goal – 300,000 new credentials of value earned by those outside the traditional postsecondary education pipeline by 2030 – will shape innovative strategies around creating and recognizing industry-driven certifications (including essential employability skills), improving the adult-readiness of postsecondary institutions and organizations, expanding and aligning career technical education and work-based learning, removing barriers to education and training, and others.

#### Create a Board culture that is resilient and adaptable and flexible to a changing economy:

This Imperative is important because the WTDB is also committed to connecting and convening all of Oregon's communities (tribal, rural, urban, and others) to solve our most pressing challenges. This requires that the WTDB connect initiatives to outcomes and hold the workforce system accountable for results.

#### Performance Goals:

Please refer to Appendix 1.

#### Assessment:

Oregon will assess its workforce system effectiveness through a variety of methodologies and assessments.

In September 2017, a Continuous Improvement Committee of the Oregon Workforce and Talent Development Board (WTDB) tasked the staff to the Workforce System Executive Team to assess Local Workforce Boards. The assessment included four categories with accompanying indicators, based on national best practices and characteristics of high performing local boards, along with areas of focus identified in the local planning guidance. Assessment Categories were: Data Driven Decision Making; Strategy; Partnerships and Investments; and Programs. To complete the assessment staff gathered and reviewed board materials, interviewed/engaged with local staff and stakeholders, attended a board meeting in each area, and met with Local Leadership teams as available. A tool was developed to collect best practices and identify areas for technical assistance. The assessment successfully concluded in 2018 and results were presented to the WTDB. Future policy and process are planned to continue these local board assessments but these have not yet been fully developed and implemented.

The WTDB has also adopted nine system performance measures that are aligned to the WIOA performance measures. The WTDB has established a dashboard on its website and reviews and updates the following measures on a quarterly basis to identify statewide policy and program recommendations:

- Employment Rate, Quarter 2
- Employment Rate, Quarter 4
- Median Earnings
- Entered employment
- Wage Gain
- Business satisfaction
- Job seeker satisfaction
- Credential Rate
- Measurable Skill Gain

These state–level outcome measures will be tracked statewide and by local workforce development areas as frequently as feasible. This tracking will help identify areas where policy or process adjustments may be needed. It will also identify the local areas that have achieved better results whose policy and processes may be shared and emulated elsewhere.

Local workforce boards may opt to track and analyze additional performance indicators and goals to track their own performance. These measures would be based on each area's specific economic and workforce conditions and the goals of the area. Although there may be significant overlap, it will be up to each local area to determine which performance indicators are relevant for the region, consistent with WTDB strategies, to meet the vision and goals laid out by WTDB. The WTDB, in partnership with state agencies and the local boards, will continue development of additional measures to assess the statewide implementation of the goals and strategies. These measures will be developed through the WTDB and project specific work groups, which will involve members from the state board, representatives of state workforce agencies, and representatives from local workforce development boards.

This work requires state agencies and local workforce boards to continue the shift from a compliance– and program–specific orientation to a highly–integrated, outcomes–based system that makes value– added investments based on community needs. This work will also require greater responsibility, accountability, and autonomy for decision making at the local level.

Effectiveness of local service delivery through WorkSource Oregon will occur through the continued implementation and comprehensive use of the WorkSource Oregon Operational Standards. The workforce system will continuously evaluate its programs, services and processes in light of how these support the greater system goals, and add value to the experiences of customers, businesses and job seekers. The workforce system will continuously evaluate its programs, services and processes in light of how these support the greater system goals, and add value to the experiences of customers, businesses and jobs seekers. These indicators may be either outcome–related or process measurements. For example, the partners at the one–stop centers in Oregon have initiated a process and developed statewide operational standards for the centers. There will be a measurement system for the standards. This system recognizes that the workforce areas are starting at different places and performance is not anticipated to meet all standards across the state. However, the measurements will help determine how we be are moving toward full implementation of the standards by region.

## c. State Strategy

The Unified or Combined State Plan must include the State's strategies to achieve its strategic vision and goals. These strategies must take into account the State's economic, workforce, and workforce development, education and training activities and analysis provided in Section (a) above. Include discussion of specific strategies to address the needs of populations provided in Section (a).

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

2. Describe the strategies the State will use to align the core programs, any Combined State Plan partner

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

#### Oregon's State Strategy

#### **Industry Sector Strategies:**

All Local Workforce Development Boards identify targeted sectors as part of their planning process. LWDBs develop service priorities and dedicate resources based on local plans and investment strategies. Strategies by LWDBs focus on demand-side aspects including connections to economic development and regional priorities, and the engagement of employers and industry groups while strategies by WSO will focus on the supply-side elements of a sector strategy, utilizing sector-based career pathways and training programs to prepare and connect qualified jobseekers and workers to high-demand sector-based occupations and careers.

Oregon now prioritizes Next Generation Sector Partnerships[1]. Next Gen Partnerships are partnerships of companies from the same industry in a shared labor market region, that work with education, workforce development, economic development and community organizations to tackle common needs of the targeted industry. They primarily focus on the education and workforce training needs of an industry, but Next Gen partnerships also focus on other issues related to an industry's competitiveness. This ensures deeper, broader and longer-term industry engagement. Some LWDBs have implemented Next Gen Partnerships.

#### Work-Based Learning:

WIOA aims to create job-driven centers that focus on work-based learning, industry-recognized/postsecondary credentials, career pathways, and enhanced connections to registered apprenticeship. Work-Based Learning (WBL) as defined in Oregon's draft CTE State Plan is structured learning in the workplace or simulated environment that provides opportunities for sustained interactions with industry or community professionals that foster in depth firsthand experience of the expectations and application of knowledge and skills required in a given career field. It includes apprenticeship, on-thejob training (OJT), clinical/practicum/internships, school-based enterprises, workplace simulation/technology-based learning, service-learning, and cooperative work experiences that are linked to careers. WBL is focused on sustained interaction with business and industry, earning of academic credit, and skill-attainment verification. In addition, Integrated Education and Training (IET) models within Oregon's Title II Adult Basic Skills programs contain a variety of WBL components and are designed to help Oregonians transition to employment.

Within the broad category of WBL, registered apprenticeships are a key priority. Significant effort has occurred and is planned to expand registered apprenticeship, for employers and individuals and to: (1) implement a training program to educate staff in WorkSource Oregon centers and agency central offices about Registered Apprenticeship; (2) build coalitions and relationships with industry and community partners to create and expand registered apprenticeship programs; (3) partner with LWDBs to ensure new apprenticeship programs are aligned with industry need and local sector strategies; (4) partner with secondary and post-secondary institutions and community partners to increase youth opportunities; and (5) continue to increase the number of women and minorities

involved in registered apprenticeship programs by working with community partners and DHS as recruitment sources and to provide supportive services during portions of the apprenticeship training period.

In Oregon, registered apprenticeship has been almost exclusively focused in construction and, to a lesser degree, industrial manufacturing or utilities. Both healthcare and information technology have been identified as industries in which there is a prime opportunity to expand the registered apprenticeship model. Because Oregon focuses on locally driven strategies and on being responsive to employer needs, there are many opportunities to expand registered apprenticeship to new businesses throughout the state, using LWDB industry sector strategies.

#### **Career Pathways:**

Under WIOA, career pathways are a critical element of academic programming for Title II, Adult Education and Family Literacy Programs, one of the six core programs of the Act. Title II providers have both programmatic and performance based outcomes related to career pathways.

Oregon has long been a leader in a community college–based initiative focused on building Career Pathway credit bearing certificates at the colleges. A strong coalition of colleges have worked together to build a Pathways Alliance which has supported the implementation and continuous improvement of Career Pathways within the colleges. These Career Pathways certificates are developed in collaboration with employer representatives and are approved at the state level based on local labor market information and other criteria.

As Local Workforce Development Boards (LWDBs) work to expand career pathway options for unemployed and underemployed Oregonians, a variety of approaches may be utilized, depending on local needs and resources. These options are represented on the graphic that summarizes what career pathways mean in Oregon, and the variety of options that may be included in a career pathways strategy.

Oregon has adopted the following working definition of Career Pathways: Career pathways are sequences of high-quality education, training, and services connected to industry skill needs. Career pathways have multiple entry and exit points that allow individuals to achieve education and employment goals over time. Career Pathways may include: apprenticeships, on the job training, industry recognized credentials, non-credit training and certificates, credit certificates and degrees. Part of this effort will be to move towards a wider inclusion of career pathways in our Title II, Adult Basic Education, and English language acquisition classes, as well as building new career pathways through apprenticeship programs.

All programs will be designed to expedite transitions from unemployment to employment, from underemployment to better employment, or, as in the case of displaced workers, from one industry to the next. Each LWDB will be addressing targeted populations as they build career pathways. Outreach to these targeted populations will be expanded. LWDBs will align their career pathways to their sectors, working with industry to establish trainings that are aligned with business needs. Business will benefit by having a pipeline of workers into their industries that are well trained and work ready.

#### **Adult Attainment:**

In 2018, the Higher Education Coordinating Commission (HECC) and the Workforce and Talent Development Board (WTDB) established a new statewide adult education and training attainment goal:

Oregon anticipates more than 120,000 additional jobs requiring post-secondary training or education between now and 2030. In order to meet this need, 300,000 additional adult Oregonians should earn a new degree, certificate, or credential valued in the workforce during that time. Because Oregon has

substantial attainment gaps among minority, low income, and rural Oregonians, the state will also commit to reducing those attainment gaps by half during the decade.

The Goal applies to adults 25 to 64 years old who not currently enrolled in a high school equivalency program, an institution of higher education, or another post-secondary training program.

The broader purpose of the Adult Attainment Goal is to drive improvements in Oregon's educational and workforce systems. In order to improve the state and the lives of Oregonians, strategies are under development by a joint HECC and WTDB Adult Learner Advisory Committee to help adult Oregonians increase their skills, especially those who have been on the sidelines of the economic recovery. A broad and inclusive approach to both how people gain skills, in addition to who gains skills is also needed. The future prosperity of Oregon depends on innovative and inclusive approaches to skill and talent development for adults from all backgrounds, skill levels, and regions of the state.

#### **Strategy Alignment:**

Talent is the driver of economic growth; industry, education, workforce, and government must work together to create more robust and agile education and training models for both incumbent workers and new graduates. As highlighted in WorkSource Oregon Operational Standards, the State of Oregon's workforce system provides a solid foundation for collaboration to promote improved customer service and increased effectiveness. Creating a streamlined, collaborative workforce system directly affects the success of all other workforce development goals. If the system is not aligned, easy to navigate, and focused on the customer, all other efforts to improve our services will be less effective. Work continues to better integrate data systems to deliver improved customer service. In addition, work continues to strengthen the framework for partnering by developing and implementing processes will make it easier for state agencies, local boards and other workforce organizations to work together and better understand each other's services.

Executive leadership from Vocational Rehabilitation (VR), the Higher Education Coordinating Commission (HECC), Oregon Employment Department (OED), the Department of Human Services (DHS) Self Sufficiency Programs (SSP), and others have formed the Workforce System Executive Team (WSET) to facilitate alignment of services, programs, and resources. WSET also works to maximize limited resources through these efforts. As resources become scarcer, partnering will help to stretch them further to impact the outcomes of all participating organizations. Financial, institutional, political and other barriers to effective partnering will be reviewed and revised to minimize their effect on partnerships.

The WTDB, the state workforce board, has also approved new Imperatives, Objectives, and Initiatives as a part of the WTDB's one-page 2020–2021 Strategic Plan. This Plan will guide the workforce system to capitalize on its strengths, identify and address obstacles, and promote continuous improvement of services through actionable recommendations and guidance. One key focus area is to develop a results-oriented culture to create a workforce system that is known, with services that are easy to access, and coordinated with education and economic development. It is the WTDB's intent to ensure that state agencies, education and training partners, and local boards continue to hear from their customers and adapt programs to meet their needs, rather than focus solely on programs and meeting federal law. For many customers, services from more than one of these program areas will be needed to reach a successful outcome. The workforce system can be best coordinated and most effective when all partners understand each other's services and the communication paths are clear and well utilized.

Finally, the state has established a strategy to increase resources for occupational skill development, including setting a minimum threshold for local workforce board investment in occupational training to better prepare job seekers in the skills needed by businesses. Another example, is the creation and funding of the WTDB's Strategic Innovation Grants (SIGs). SIGs are now in their second round providing for potential partners (grantees) outside of the traditional workforce development system

and focusing on innovation that supports the WTDB's Strategic Plan. Oregon has also provided state funding for work-based learning, industry engagement, and LWDB competitiveness initiatives.

[1] Next Generation Sector Partnerships at nextgensectorpartnerships.com, Materials are © 2019 [NEXT GEN SECTOR PARTNERSHIPS]. ALL RIGHTS RESERVED.

## **III.** Operational Planning Elements

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

## a. State Strategy Implementation

The Unified or Combined 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).

#### Oregon's Workforce and Talent Development Board

The Oregon Workforce and Talent Development Board (WTDB) has only one standing committee, the Executive Committee. The WTDB has fully transitioned from standing committees to task forces in order to be more nimble. Task forces allow the WTDB members, key stakeholders, and subject matter expects to more quickly address important issues, problems, and workforce priorities and, when the work is completed, sunset the task force. The task force model also allows for more flexibility in the composition of membership allowing for more diversity of input. Currently, the WTDB's task forces are:

- Artificial Intelligence (focused providing postsecondary education in step with the AI industry);
- Licensing (focused on removing barriers and smoothing transitions related to licensing); and
- Essential Employability Skills (focused on the provision of education and training needed to acquire the collection of skills necessary to succeed in the workplace that include problem-solving, critical thinking, communication, teamwork and others).

Recently, the WTDB sunset the True Wage Task Force focused on issues related to true wage determination and diversity, equity, and inclusion. True Wage is a wage that meets or surpasses the threshold of self-sufficiency in all regions of the state and for all family types. Self-sufficiency is realized when there is no reliance on public benefits and where reasonable living expenses (e.g. housing transportation, child care, etc.) are affordable. True wage is not yet specifically defined but will be as the focus of a related WTDB Initiative.

All task forces present their findings and recommendation to the full WTDB and may work through the WTDB's Executive Committee as well.

The Adult Learning Advisory Committee (ALAC) is an exception. It is a joint committee with the Higher Education Coordinating Commission (HECC). The ALAC is charged with facilitating achievement of the Adult Attainment Goal – By 2030, 300,000 adult Oregonians will earn a new postsecondary credential of value with enough credentials earned by racial/ethnic minority, low-income, and rural

Oregonians to reduce attainment gaps by half. Separate and distinct from Oregon's 40-40-20 Goal. This is a hybrid since it does have a sunset, 2030, but it is a long-term "task force".

The Workforce and Talent Development Board (WTDB) Executive Committee, consists of 15 members representing all of the WIOA-required membership categories including key, board leadership. This committee leads and guides the work, taskforces, and recommendations of the WTDB on key strategy, planning and policy related to workforce development issues, solutions, innovations and opportunities. To learn more about the Workforce and Talent Development Board click here.

## 2. Implementation of State Strategy

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

## A. 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 programs and Combined State Plan partner programs included in this plan and among the entities administering the programs, including using co-enrollment and other strategies, as appropriate.

#### Oregon's Core Program Activities

#### WorkSource Oregon:

The WorkSource Oregon (WSO) system integrates the services provided by all WIOA core partner programs. The state-level agencies that administer the programs, and the activities and services provided through Oregon's American Job Centers, branded WorkSource Centers in Oregon, are described in the linked WorkSource Oregon Operational Standards. Please refer to that document for detailed discussion and description of the one-stop services and activities. In order to be designated as a WorkSource Oregon center, services among core program partner staff must be aligned, resulting in seamless provision of services to customers.

All operational functions, including supervision and management where appropriate, will be taken into consideration when developing a functional staffing plan for each center. Agreed–upon staffing plans, including methodology, roles, and expectations, will be documented and may be solicited during program monitoring.

#### Adult, Dislocated Worker and Youth:

At the state level, Oregon has formed several cross–agency workgroups focused on policy that are instrumental in implementing these state strategies. Locally, each of the nine local workforce development boards (WDBs) will develop and submit a comprehensive four–year plan, in consultation with the chief elected official. This document clarifies what the local WDBs must provide and do in order to implement State strategies and be in compliance with WIOA and state requirements.

The local plan will identify activities on how workforce partners and programs in each local workforce area will align and implement the vision and goals of the Oregon Workforce and Talent Development Board and requirements of the WIOA (see local planning guidance and resources). The local WDBs are responsible for convening the workforce partners necessary to develop and implement the plan in the local area. As additional guidance is provided from the U.S. Department of Labor and/or the Oregon Workforce and Talent Development Board, the Office of Workforce Investments (OWI) within the Higher Education Coordinating Commission may ask for the local WDBs to provide additional information in the form of a local plan modification.

#### **Employment Services:**

Services provided through the WSO centers will be customer–centered. There is no longer a required sequence of services in WSO centers. Rather, the appropriate service may be accessed at any time based on customer needs. In 2015 WSO adopted the WorkSource Oregon Standards, a set of service standards that will be used to guide local service delivery, and to ensure a common language for both customers and staff.

#### Trade Act:

Trade Adjustment Assistance (TAA) for workers, commonly referred to as Trade Act, assists workers who have been laid-off or had a reduction of work hours due to foreign competition become reemployed in suitable work. Trade Act offers a variety of benefits and services for eligible workers: reemployment services, job search and relocation allowances, training benefits, income support, tax credit for health insurance, and wage subsidy for workers 50 or older.

Trade Act is an active and engaged partner to core programs and WSO centers. Co-enrollment occurs based on needs and eligibility, and documented through collaboration with partners and data systems.

Trade Act Navigators (TANs) support local rapid response service delivery and have a focus on reemployment services to trade-affected workers. Trade Act staff refer participants to support services outside of what Trade is able to provide for barrier removal.

TAA Information Sessions review benefits and services of the TAA Program, TRA deadlines, as well as sector strategies and partner services available in local areas.

Trade Act staff conduct comprehensive assessments of skill level, aptitude, abilities, skill gaps, career interests, employment barriers, and supportive service needs. To avoid duplication of services, Trade Act accepts assessments completed by partner staff and provides assessment and training plan information to partners of co-enrolled participants.

The Oregon Trade Act program's Central Trade Act Unit (CTAU) Case Management team assists trade-affected workers with identifying skill gaps, accessing and completing training required for the worker to become re-employed. Training for affected-workers should lead to employment in a high demand occupation, supported by labor market information, assessments, and meeting required criteria for training approval.

Trade Act participates in strategy meetings for each certified TAA petition that includes staff from Trade, CCWD, local service providers and unemployment insurance. Items reviewed during the meeting include wraparound services that are provided for participants that meet other funding stream requirements from partners, an overview of what Trade Act can pay for and services provided, any special training opportunities in the area, and a communication plan between partners.

#### Adult Basic Education:

The Office of Community Colleges and Workforce Development (CCWD) and local area Adult Basic Education (ABE) service providers will fund allowable activities under the Adult Education and Family Literacy Act (AEFLA). Local providers will align Title II activities with local area plans, such as sector strategies and career pathways. These adult basic education and literacy activities will also be coordinated across the core programs and partners through one–stop center participation, referrals, and co–enrollment where feasible.

An important goal for Title II Adult Basic Skills service providers will be in improving access to, and completion of, post-secondary credentials. CCWD, as the Title II agency at the state level, will

collaborate with local Title II providers to support this goal, through investment of leadership funds and other activities. An important means to address this goal will be expansion of integrated education approaches. These include programs such as I–BEST, Vocational English as a Second Language (VESL) and Oregon Pathways for Adult Basic Skills (OPABS), as well as other programs developed in response to local needs. Local Title II providers will be encouraged to explore bridge programs and services that result in transition to post–secondary education. Local Title II providers will work with the state and local boards to clearly define career pathways across the state that promote transition of adult education students into industry recognized credentials, licenses and portable stackable certificates.

#### **SNAP Employment and Training:**

The Supplemental Nutrition Assistance Program (SNAP) Employment and Training Program (SNAP E&T) provides Oregonian's with employment and training services to help them achieve and maintain their employment goals. Part of the SNAP E&T program is administered by the Oregon Employment Department (OED) and funded through a contract with the Oregon Department of Human Services' (DHS) Self-Sufficiency program. Another statewide based SNAP E&T provider is the Oregon Community College Consortium which includes all 17 community colleges in Oregon. Other WSO partners including numerous non-profit and community-based organizations around the state also receive funds through DHS to provide SNAP E&T services. This creates a SNAP Provider Network to support participants and provide an array of wraparound services, particularly for those with specialized needs such as homeless youth and adults, refugees and those in recovery and reentry programs.

SNAP participants receive a one-on-one orientation to the employment and training services available through WSO, the SNP Provider Network, and other community partners. This orientation provides an overview of the program, its benefits and requirements, so SNAP participants can choose to participate, or not participate, in the SNAP E&T program.

SNAP participants are served through a case management model of customer service. This model provides each SNAP participant with a workforce professional who works with the participant and then guides, motivates, and supports them in their process of obtaining employment. Participants are also eligible for support services to include gas vouchers, bus tickets, interview clothing, tools, and training.

Launched in 2017 as a pilot program, OED has since expanded the program statewide and continues to develop the program and build partnerships with DHS, the SNAP Provider Network and other WSO programs such as regional business services teams to help remove barriers and place participants with employment and training opportunities.

#### TANF JOBS:

The Oregon Department of Human Services, Office of Self-Sufficiency Programs administers the Temporary Assistance for Needy Families (TANF) Program. The Job Opportunity and Basic Skills (JOBS) Program is a component of the TANF Program.

The JOBS Program is Oregon's TANF employment and training program. Education, training and job placement services are provided to TANF single-parent and two-parent families with the goal of helping prepare for, find and keep a job. Job retention and wage enhancement services are provided to individuals transitioning from TANF or the Pre-TANF Program.

JOBS program services are planned for and provided through contracted partners as well as through a network of workforce partnerships including local Workforce Development boards (LWDBs), Employment Department offices, community colleges and other community partners that provide family stability services such as mental health and substance use disorder services. Coordinated service delivery planning, for both workforce and family stability-focused resources, are conducted through local planning meetings.

State leadership and technical assistance support local JOBS program efforts. A core set of mandatory procedures and services are in place in all areas. However, service delivery mechanisms and program design may vary among the 16 Districts due to differences in local needs and resources.

To provide JOBS services to working TANF participants to help them transition from TANF to employment, DHS staff uses a strength-based engagement and case management approach that works holistically with the entire family. The intent of engagement and case management is to help families move forward based on their needs and become self-supporting. DHS respects and empowers families by recognizing they are capable, have strengths, and have resources that can help them take control of their lives. Benefit delivery is integrated with self-sufficiency enhancing services. The outcome of engagement and case management is increased family accountability and success for individual families in reaching and sustaining their goals. Engagement and case management takes a team effort. The team consists of the participant, the Family Coach, branch staff and community partners the participant may be working with.

JOBS services include various levels of Job Preparation and Placement services, Retention and Wage Enhancement services, Self-Sufficiency and Intervention services, Youth and Child services and Teen Parent services.

#### Vocational Rehabilitation:

Title IV, Vocational Rehabilitation (VR) works with individuals with disabilities to identify, pursue, obtain and retain competitive and integrated employment. In Oregon, there are two VR Programs, the general VR agency and the Oregon Commission for the Blind's VR program (OCB). OCB serves Oregonians who are legally blind with specialized services. Core program activities for both VR (general) and OCB include individualized assessment, vocational exploration, job placement services, retention services and necessary and appropriate support services. Title IV, Vocational Rehabilitation and OCB works in partnership with Workforce, Education, and relevant local programs that impact a positive employment outcome for individuals with disabilities.

As Core VR programs, Oregon VR and OCB will ensure that programmatic access to our services is available at all WSO sites. Depending on local needs and opportunities, VR and OCB will continue to support the current co-location of VR staff and services as appropriate. VR and OCB will continue to have conversations about increasing co-location opportunities around the state. VR and OCB will always be available to assist Workforce partners when it comes to serving individuals with disabilities and will provide technical assistance and training in the best techniques to work with such individuals.

Vocational Rehabilitation services and VR services for Oregonians experiencing vision loss should be considered "value added" to assist our workforce partners when they are serving individuals with disabilities. VR and OCB participate on local boards and at the state level. This participation and engagement will allow VR and OCB to assist and help develop programmatic and individualized services to effectively provide employment for individuals with disabilities. Services through Vocational Rehabilitation and OCB are individualized and consumer driven. If there is the possibility of utilizing other funded activities, Vocational Rehabilitation and OCB is are required to pursue any and all "comparable benefits".

When initial assessment is complete, disability created barriers identified, accommodations identified and provided, and a career or vocational objective identified based upon interests, abilities, Labor Market Information and any other factor influencing the choice of vocational objective, employment services consist of:

- Individualized job placement activities.
- Coordination with other services that provide employment services as are available and appropriate based on the disability and the barrier being addressed.

• Follow–up and post–employment services (PES) as required for our clients in order to intervene more effectively and timely if a disability created impediment may cause job loss.

An Individualized Employment Plan (IEP) is to be completed within 90 days of eligibility unless the Vocational Rehabilitation or OCB Counselor (VRC) and the consumer are in agreement to delay. If this is the case, then the dates which the IEP will be completed must be identified.

At any stage of the VR process, VR/OCB may, with the consumer's agreement, refer to any other entity in the workforce system that may be of benefit to achieving an acceptable employment outcome.

Title IV VR and OCB, will continue to work with the local boards and other partners to ensure coordination and alignment of program elements. Current and future activities that are being practiced and proven at the local level will be shared among with the general VR agency and OCB to develop best practices. VR and OCB engage with local leadership teams when appropriate, and will continue to work within the workforce system to ensure that Oregonians with disabilities can access services they need without duplication.

Vocational Rehabilitation (VR) and The Oregon Commission for the Blind (OCB) will continue to work with clients to ensure that businesses have access to the talent they need through the VR system. VR and OCB work with Community Rehabilitation Providers and contracted individual job developers to reach out to employers and market the individual skills of participants who lack the ability to market themselves. Through this process, businesses often get employees whom they otherwise would not have screened into employment opportunities but who can meet their business needs. VR and OCB also work with federal contractors to help meet their Section 503 requirements and targets.

VR and OCB will be establishing establish procedures that are acceptable under our rules and regulations to assist our clients in moving forward in their careers and address disability based barriers that may preclude future career growth. We will also listen to the business needs of the indemand occupations so that our clients will be prepared for employment opportunities that exist in our economy and have opportunities for growth and advancement.

VR and OCB is are active in working with students and the educational system to ensure access to appropriate and timely labor market and employment information to assist the students in making informed decisions regarding future careers and work. VR and OCB are partnering with the educational systems to provide meaningful work experience and opportunities. While the VR focus and mandate is to work with students with disabilities, a framework is being established that may be replicable and effective for all students. We will build from our current youth program that is an internationally recognized best practice.

Due to the application and eligibility process of VR and OCB services, co enrollment needs to be defined and cannot include an "eligibility" process. At this time discrepancies between core programs exit process will have an impact on co enrollment planning. Strategies regarding co enrollment will be influenced by the results of our resource sharing agreement, which will need to be finalized at which time we can proceed with planning. Co-enrollment of VR and OCB clients with Title I and Wagner-Peyser services is a longer-term goal but these, and other significant issues exist and must be overcome, such as inflexible and out-of-date Information Technology systems and full accessibility of workforce system tools. However, Oregon continues with its early planning efforts to modernize its computer systems. The feasibility of integrating VR/OCB, Wagner-Peyser and Title I enrollment processes into one seamless process will be explored as part of that effort.

#### Higher Education Coordinating Commission:

The Higher Education Coordinating Commission (HECC) has responsibility for developing state budget recommendations, allocating state funding, and approving new academic programs at Oregon's community colleges and universities. Within the HECC, the Office of Workforce Investments (OWI) is responsible for WIOA Adult, Dislocated Worker and Youth and the Office of Community

Colleges and Workforce Development (CCWD) is responsible for Adult Basic Education. In addition, CCWD will work with all 17 community colleges to support effective practice in transitioning working learners into post–secondary credit programs. This work includes supporting these students during their programs with both internal college services and WIOA partner supplied services (i.e. SNAP, Vocational Rehabilitation). In addition, students will have appropriate guidance and support as they complete their degree or certificate and seek employment or further education.

#### U.S. Department of Housing and Urban Development:

PHAs and CDBG Entitlement Jurisdictions are also able to access and/or utilize their funding to support job creation, job training/education, and family self-sufficiency activities. The funding streams available to PHAs include the Family Self-Sufficiency program which combines three factors that, together, can help households in HUD-assisted rental housing make progress toward economic security: (a) stable, affordable housing; (b) case management or coaching to help support residents in identifying and pursuing goals, connecting to work-promoting programs and services, and building financial capability; and (c) an economic incentive for participating households to increase their earnings in the form of an escrow account that grows as participants' earnings' grow; Family Unification Voucher (FUP) provides rental assistance and supportive services to participating FUP youth for the first 18 months that the youth participates in the program. Examples of the skills targeted by these services include money management skills, job preparation, educational counseling, and proper nutrition and meal preparation: Foster Youth to Independence (FYI) Vouchers is a partnership with local PHAs, public child welfare agencies (PCWAs), and Continuums of Care (CoCs) to assist communities in ensuring that every young person who has had experience with the child welfare system has access to safe, affordable housing where they are supported to reach self-sufficiency by working toward their education and employment goals.

#### Oregon's Cross-Agency Teams and Work Groups

#### The Workforce System Executive Team (WSET):

The WSET is both an operational and decision–making group regarding workforce system project development and implementation. The WSET is responsible for the following activities:

- Collaborating and jointly agreeing on best approach to workforce systems issues that impact multiple agencies, programs, or initiatives.
- Providing/assigning resources to populate project teams.
- Ensuring that projects are staffed by cross-agency resources.
- Ensuring alignment across projects and teams with a system-wide viewpoint.
- Providing consulting and oversight to project teams.
- Making project, system, and program commitments for their agency, as appropriate.
- Reviewing and approving outcomes, products and recommendations of project teams.
- Making recommendations to leadership for approval, as appropriate.
- Representing agencies and briefing respective leadership on discussions and progress outside of meetings.
- Knowing when leadership must be consulted for a final decision and ensuring that all stakeholders requiring input at the leadership level are included in vetting processes. Inviting stakeholders (leadership, content experts, etc.) to meetings as appropriate to the agenda to ensure that work continues to advance.

WSET members include agency and program managers from:

- Employment Department (W–P/Title III, UI, MSFW, Vets, LMI)
- Higher Education Coordinating Commission (Titles I & II)
- Department of Human Services (Title IV, SNAP E&T, TANF)
- Oregon Commission for the Blind

WSET engages other partners as appropriate including Business Oregon, Department of Human Service Senior Community Service Employment Program, and U.S. Housing and Urban Development Employment & Training.

#### WIOA Local Area Advisory Group:

The purpose of this group is to identify state and local policy and process needs and provide feedback on policy development. Membership includes local area program managers, compliance officers, etc., with state staff filling guest/advisory/technical assistance roles as needed. This group includes a youth–focused sub–group.

#### **Career Pathways Alliance:**

The Alliance is made up of program staff, directors and others who oversee career pathway initiatives and programs within the 17 Oregon community colleges, including short-term training programs and bridge programs for Adult Basic Skills students. Vocational English as a Second Language (VESL) is often a part of Oregon's high quality, Career Pathways infrastructure. This track includes CTE programs with stackable credentials and strong relationships with the industry and local employers to identify competencies and needs. VESL courses accelerate time to completion and increase certificate and degree attainment for low-skilled workers and Adult Basic Skills students.

#### Community College WIOA Workgroup:

This is a diverse cross–section of community college administration, staff, and faculty members who serve in workforce development, career and technical education, customized training, and adult education programs. Within the WIOA Workgroup there are various subgroups working on specific issues: creating a community college planning framework, developing a definition/visual for career pathways in WIOA, investigating data and reporting concerns with the eligible training provider list, etc.

### B. 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 Oregon Department of Education, the Higher Education Coordinating Commission, the Oregon Employment Department and the Oregon Bureau of Labor and Industries, have developed a strategic partnership to align and develop career pathways that include career and technical education and Registered Apprenticeships. This partnership funds two staff who work with secondary and

postsecondary institutions and employers to identify areas where apprenticeship opportunities may be aligned with career and technical education programs to meet local employer needs.

At the state level, alignment and collaboration between the core programs and the programs and activities provided by mandatory and optional one-stop partners will occur through the state-level, cross-agency workgroups described in the previous section. Additionally, options to provide meaningful access to required programs will be explored locally and addressed through local planning efforts. Service strategies will be tested for effectiveness and efficiency. When the opportunity exists and it makes good business sense, co-location options will be considered. To see how the activities of the local workforce areas will be aligned amongst the four core programs and with other programs, view the local plans.

Alignment of activities to ensure coordination of programs and activities and avoiding duplication will be satisfied through the pooling of shared resources and staffing the four services mandated in the WSO Operational Standards. Jointly staffing the four services (Exploratory, Career, Training and Business) is Oregon's method to avoid duplication and ensure coordination of all partners within the one–stop offices.

The Oregon Employment Department, Oregon Department of Education, and the Bureau of Labor and Industries are also working together to build clear pathways to Registered Apprenticeship programs for individuals at any education level. This work includes training WorkSource Oregon staff to help customers navigate the registered apprenticeship system, as well as educating community college staff on the value of apprenticeship and their roles as related training providers within the system. The Oregon Employment Department and Oregon Department of Education both employ apprenticeship program liaisons that work with the Oregon Community College Apprenticeship Consortium, which is a group that is comprised of 14 of 17 of Oregon's community colleges that provide three statewide apprenticeship degrees. This group helps ensure that new apprenticeship programs are articulated for college credit and that Oregon's employer community is aware of and has access to the latest career and technical education courses.

Vocational Rehabilitation (VR) and the Oregon Commission for the Blind (OCB are reviewing strategies to utilize services that will impact Apprenticeship and pre-apprenticeship programs. Historically, Apprenticeships in Oregon do not align with VR timeframes and often have challenges around accessibility, but this is being evaluated programmatically due to new expectations. VR/OCB program services program may very well have the most impact when it comes to providing pre apprenticeship work for youth with disabilities so that this group has the opportunity to prepare for future apprenticeship opportunities should the individual choose to do so.

Local state agency branch and field office managers from core and mandatory partners will work with their local WDBs to ensure that those receiving public assistance, low–income individuals, and those who are basic skills deficient are included in local WIOA plans and that they have a voice in the system. The agencies will work to find a way to market WIOA services to the above categories of individuals to ensure that they are aware of services and that they may use their classification to ensure priority of service. Staff at the WorkSource Oregon centers and Affiliate Sites will be trained to understand that upon discovery that an individual belongs to a priority category that priority of service will be explained to that individual. Basic skills deficient individuals can be identified through Initial Skills Review testing in the WorkSource Oregon centers, and the National Career Readiness Certificate. Basic skills deficient individuals can be identified for priority of service and can be expedited into job search and occupational skills training programs.

The WSO Standards require Title II workforce preparation services, which are provided through each WSO Center. Local areas are responsible for ensuring WSO and Title II services are available and appropriate referral mechanisms are in place to connect WSO customers with Title II services as needed. Title II will work with other core programs and one–stop partners to develop a mechanism for referrals and co–enrollment where possible. Local adult education and literacy providers will align participation in one–stop centers with local service goals, supported by informed participant referrals facilitated by one–stop center staff cross–training.

As a partner to the core programs, Trade Act programs align with core programs in this plan.

- Trade Act co-enrolls participants based on systems and partners speaking to each other.
- Trade Act accepts assessments completed with partner staff; likewise, Trade Act provides assessment and training plan information to partners of co-enrolled participants.
- Wraparound services are provided for participants that meet the NEG/SEG or other funding streams requirements from partners.
- Trade Act will refer customers to resources within the agency or community.
- Information sessions to be focused on benefits and services available to affected workers as well as the sector strategies in their area.
- Trade Act will also actively pursue the business community through connections to Rapid Response, On-the-job training opportunities, and Business Teams within WSO centers. Connections to business will include marketing program information, layoff aversion resources, and job talent.
- Trade connects to all core programs through methods of assessment and referral to appropriate entities.
- Strategy meetings, which are bi–monthly meeting between Trade, CCWD, local service providers, unemployment insurance, and case managers, cover funding streams and special training opportunities in the area, education of partners in what Trade Act can pay for and services are provided.
- Trade Act refers participants to services outside of what can be provided by Trade to help with barrier removal.
- Conduct comprehensive assessments of skill levels, aptitudes, abilities, skills gaps, career interests, employment barriers, and supportive service needs individually and in group settings.
- Make work–based opportunities available to customers in accordance with local area plans and investment strategies.

In 2020 Trade Act will be piloting strategic connectivity with additional Federal Programs: SNAP/ABAWD/STEP, RESEA, Veterans, WOTC/ATAA, MSFW/ATAA, and Justice Affected Trade eligible Oregonians.

It is the Oregon Unemployment Insurance (UI) program's goal is to ensure all UI claimants are fully aware of, and appropriately using, the reemployment resources available to them through our workforce system. Some UI program activities are performed in WorkSource Oregon (WSO) offices and are aligned with programs and activities provided by mandatory one–stop partners and other optional WSO partners. Such activities include providing in–person information and assistance filing UI claims via phone or computer, providing general information about UI eligibility requirements, and referring potential UI eligibility issues to UI merit staff in the program's UI Contact Center.

Through the filing of an initial UI claim, customers initiate the process to become co–enrolled across core and partner programs available in one stop centers. Some customers, who may potentially be eligible for special programs, such as the Self-employment Assistance (SEA) program, the Training Unemployment Insurance (TUI) program, the Trade Readjustment Allowance (TRA) program, the Apprenticeship program, and the WorkShare program, are referred either by WSO office or UI Contact Center staff. These special programs are administered by the UI Special Programs Center. Information regarding all of these programs is also provided by staff at WorkSource Oregon centers.

Some additional details about the special UI programs offered in Oregon include:

• The SEA program enables customers to receive UI benefits while starting their own business,

- The TUI program enables customers to receive UI benefits while attending school,
- The apprenticeship program enables customers to receive UI benefits while participating in apprenticeship training programs, and
- The TRA program enables customers to receive UI benefits while participating in the Trade Adjustment Assistance (TAA) program.
- The WorkShare program is Oregon's Short-Time Compensation solution and provides an alternative for employers and workers who may be facing the prospect of a lay off situation by providing partial UI benefits to workers whose hours have been reduced.

Employment Services (ES) staff and partner staff in one stop centers maintain the ability to email or call UI merit staff in the UI Contact Center, the UI Special Programs Center, and in the UI Operations and Program Support Unit to directly assist customers when necessary. Additionally, information is shared with UI claimants about the various programs available in Oregon at the centers on the public computers, hard copy brochures, posters, and public information videos playing on digital displays in the lobby.

The UI program in Oregon is also currently receiving federal grants to provide enhanced reemployment services for UI customers. Some customers are selected for a Reemployment Services and Eligibility Assessment (known as RESEA) as part of their orientation. RESEA interviews are conducted in person by ES merit staff in one stop centers who are co–located with local board service providers.

Oregon's UI program is examining other innovative ways to increase the UI claimant reemployment rate. As an incentive to claimants, the agency allows customers to list one work seeking activity for each test taken for the National Career Readiness Certificate (NCRC) and other similar activities. The program is also partnering with a local workforce board to offer the Rethinking Job Search (Rethinking) program to a selection of UI claimants in several areas of the state. Rethinking uses cognitive-behavioral techniques in an intensive educational workshop to boost claimants' confidence in their ability to quickly be reemployed through enhanced motivation and self-efficacy in job-search activities.

## C. 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 (e.g. transportation), to individuals, including those populations identified in section II(a)(1)(B), and individuals in remote areas. The activities described shall conform to the statutory requirements of each program.

The core programs highlighted in this plan and mandatory one stop partner programs will coordinate activities and resources through implementation of the WTDB strategic plan, local planning process and the WSO Operational Standards. Local state agency branch and field office managers from core and mandatory partners will work with their local WDBs to ensure that efforts are coordinated, aligned and that outreach to target populations, including those with barriers to employment (such as individuals receiving public assistance, low–income individuals, and those who are basic skills deficient) are included in local plans.

Local plans identify how workforce partners and programs in each local workforce area will align and implement the vision and goals of the Oregon WTDB and requirements of the WIOA. Using the WSO Operational Standards as a statewide framework, all nine local workforce areas are responsible for developing systems and processes to better serve WSO customers. The WSO Operational Standards

require strong collaboration among system partners and holds local leadership teams accountable for outcomes. Although, the specific processes for coordination, alignment and outreach will be different in different areas of the state, The WorkSource Oregon Operational Standards are a benchmark for service provision. Ongoing communication between the Local WDBs will allow for best practices to expand between workforce areas.

The agencies will continue to provide services to individuals with barriers to employment and to locally outreach to them, as funds permit, to ensure that they are aware of services and that they may use their classification to ensure priority of service. Perhaps more importantly, Oregon is continuing to expand coordination between state agencies who already serve individuals with barriers to employment, thus allowing easier identification and access to these populations.

Expanded coordination with programs serving disabled (Vocational Rehabilitation), low-income (TANF and SNAP) and ex-inmates (Corrections) are examples. Staff at the WSO centers and affiliate sites will be trained to understand that upon discovery that an individual belongs to a priority category, priority of service will be explained to that individual.

Title II providers in the local areas will coordinate activities and resources to provide high-quality customer services in cooperation with the other core programs. For example, adult education and literacy providers will support cross-training of core program and one-stop center partner staff to support referrals and co-enrollment. Title II providers will leverage connections with core program and WSO center partners where feasible to include support services for participants, such as transportation, childcare, and housing. Title II providers also create, maintain, and build connections with training providers for career pathways and workforce preparation activities.

Trade Act staff provide case management services to trade affected workers on their path back to suitable employment, and assist affected workers with barriers along the way. Trade Act participates in meetings with local workforce boards and WorkSource partners to help align and leverage services to meet the needs of affected workers. Trade Act is an active partner in Rapid Response (RR) activities at both the state and local level. This provides an opportunity for Trade Act to advise and educate partners on the TAA program guidelines and protocols and learn more about partner programs and services, improving planned services for trade-affected Oregonians.

Services offered to individuals in WorkSource centers are coordinated and aligned with the state's Unemployment Insurance (UI) program to ensure equal access. UI claimants are a targeted population within WSO centers and staff receive UI training to ensure access to information about UI benefits is comprehensive, high–quality, and customer–centered. For dislocated workers, Oregon WSO supports and participates in the Training Unemployment Insurance and Self- Employment Assistance programs. In addition, Oregon uses a variety of media including brochures, posters, and digital displays in multiple languages in locations to ensure universal access.

The state's SNAP E&T Provider Network (consisting of OED, various WSO partners and community based organizations throughout the state) tracks and records services provided to SNAP participants in a central database – iMatchSkills, the state's labor-exchange system. As such, iMatchSkills serves as the central case management system (or management information system) for program reporting and tracking support services and case management activities provided to SNAP participants. This central case management system helps avoid duplication of services and provides for more coordinated and seamless delivery of services to SNAP participants. To further coordinate and promote partnerships within the SNAP Provider Network, the Oregon Department of Human Services (DHS) Self-Sufficiency team (which oversees SNAP E&T contracts with SNAP providers) hosts regular meetings with service providers to share information, promote the program and further strengthen partnerships within local areas. SNAP E&T brochures and program videos to include testimonials have also been developed by OED to promote the program.

## D. 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.

The coordination and alignment of activities and resources in WorkSource Oregon (WSO) centers will involve multiple stakeholders in order to provide comprehensive, high–quality services to employers and meet their current and projected workforce needs. WorkSource Oregon stakeholders will align services to businesses through the use of sector strategies and partnerships, the Oregon Talent Council, local workforce boards, and the WorkSource Oregon Standards. Additionally, education and training system partners will work directly with industry to improve retention, expansion and recruitment. Industry and sector partners will work with education, workforce development, economic development, and community organizations to focus workforce priorities around key industry issues and goal attainment.

Industry partnerships provide a place for companies to solve major talent issues, a single place to work with public entities, and an opportunity to share costs to solve industry problems. These sector partnerships also provide educational partners a forum though which they can learn about evolving industry needs, and a vehicle to identify, build and refine curriculum, programs and credentials.

Industry partnerships allow workforce partners to quickly refine their investments based on industry feedback and provide an efficient mechanism through which businesses can access public services.

All WSO centers are required to develop, implement and actively manage two feedback loops aimed at aligning and improving services. Centers will develop a feedback mechanism that evaluates the quality and effectiveness of training funded by WSO. Feedback will be solicited from both the business and trainee to ensure training providers are meeting the needs of business. Feedback will also be solicited from business through ongoing customer satisfaction surveys in order to determine the overall quality of WorkSource center job seeker referrals and staff services. Both mechanisms are designed to improve the workforce system's ability to deliver customer centric services.

The most important business service WorkSource Oregon centers provide is connecting job seekers to job openings. Providing quality referrals to connect job seekers and employers ensures that WorkSource Oregon is providing a value–added service to business and that it is supporting the goals of local sector and industry strategies and partnerships, targeted populations, and local workforce investment priorities.

Through the enhanced business services model, currently operating in five of the nine workforce regions, WSO center staff conduct an on-site employer visit prior to recruiting and referring candidates. WSO staff aim to refer only five candidates to one job opening, unless specified by the employer. Many WorkSource Oregon centers use this model to provide a consultative approach when serving business customers. The goal is to meet with business customers, understand their workforce needs, and then collaborate with workforce system partners to design a package of services that meet business needs.

This collaboration includes economic development as a workforce partner in order to develop comprehensive solutions to support the goals of business and industry customers. The state and local boards also consult with their network of cluster/industry associations, chambers and business leadership councils.

Placement and recruitment activities must include a feedback mechanism between WSO staff and employers. Employer feedback will be solicited to validate the readiness and quality of referrals, to monitor outcomes, and adjust local career and training services based on the feedback received. Feedback will be shared with the workforce system to ensure continuous quality improvement. Co–

location and co–delivery efforts are designed to offer smooth service delivery and increased leveraged services while generating greater service options for business customers.

Collaboration between all workforce system partners is required to ensure the broadest possible service options are made available to the business community, including how these options meet the needs and goals of sector strategies and industry partnerships. An important system partner is Title II or AEFLA.

#### **Recent Program Activity:**

Services produced the following outcomes in Program Year PY 2018:

9,747
4,976
245,205
150,805
2,935
82,050
3.40
50%
24 days
1,220
2,626

\*NLx: Electronic labor-exchange network, created in 2007 in a partnership agreement between NASWA and Direct Employers Association

\*\*Placement: customer is hired on a job listing to which staff referred them

\*\*\*Hires: customer is hired after receiving staff-assisted services or self-referring to a job listing

AEFLA-funded Adult-Basic-Skills Programs work with employers through connections with their colleges' Career Pathways, Customized Training, Workforce Training, and Occupational Skills Training programs. Another critical partner is VR. The Vocational Rehabilitation program by design contacts the Business and employer community utilizing a client specific approach. VR's approach of utilizing contracted vendors to job develop for individual clients indicates a different model regarding employer outreach. However, employers also approach the VR offices with Job Opportunities and VR will address a process where these contacts and opportunities can be blended into a Workforce combined business outreach method.

Co-location, co-delivery, and the use of the WSO labor exchange will increase the communication level across the partnerships, to include economic development, resulting in the necessary collaboration to ensure business customer needs are met through a cost–effective allocation of resources.

The WSO labor exchange system (iMatchSkills) allows staff and employers to manage job opportunities, greatly expanding the service delivery options for employers. Jobs may be entered via automated mechanisms, self–service, or staff–assisted services. Employers may also set up an account online to post job listings 24/7, match to qualified candidates, and contact the job seekers directly.

Oregon is exploring additional ways to align and integrate business services, by coordinating business outreach efforts and to identify and target key industries in order to increase market

penetration for the WorkSource Oregon System and by understanding all the points of contact between businesses and workforce partners.

For example VR or OCB are the VR program is working with the Local Leadership Teams and LWDB's to have full understanding of the identified Sector Strategies and Sector Partnerships at the local level. As individual VR/OCB clients are counselled and address his or her career development, the local sector partnership details and goals are shared with these job seekers with disabilities. These participants can then determine if these sector industries/employment areas, and associated career development, are something the individual client would wish to pursue.

Additionally, Local Veterans Employment Representatives (LVER) partner with the Bureau of Labor and Industries (BOLI) apprenticeship and On-the-Job Training (OJT) representatives to ensure that employers are aware of the benefits of hiring a veteran. LVERs also communicate apprenticeship and OJT opportunities for veterans to WorkSource Oregon Business and Employment Specialists and Disabled Veteran Outreach Program staff.

Oregon's Trade Act program is recognized as a TAA national best practice for creating and utilizing unique roles to improve specific services to trade-affected workers and business services is one of those areas. In Portland's tri-county area the Trade Act program has added four positions to the local Regional Business Service Team. Three positions are Regional Business Services TAA Specialists (RBST) whose role is to help facilitate the employment of trade-affected workers with special emphasis of placement in target industry sectors. The RBST utilize enhanced job listings of the RBS team as the first resource to refer job seekers. When there is no relevant job listing, the RBST utilize other job postings or do outreach for job development purposes. RBST support business and provide a package of information to employers, which includes on-the-job training (OJT), classroom education, apprenticeship connections and layoff aversion information through Workshare and Trade Adjustment Assistance for Firms (TAAF). Trade Act Navigators (TAN) outside of the Portland tricounty area perform these duties in their area(s). Both RBST and TAN staff make presentations to communities, businesses, partners, and coordinate and assist with the planning and implementation of job fairs.

## E. Partner Engagement with Educational Institutions

Describe how the State's Strategies will engage the State's community colleges and area career and technical education schools, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv).

#### **Post-Secondary Education and Training Attainment:**

Oregon House Bill 2311 (2017) directed the Higher Education Coordinating Commission (HECC) and the Workforce and Talent Development Board (WTDB) to establish a statewide educational attainment goal for adult Oregonians separate from 40-40-20. The HECC and WTDB convened the Adult Attainment Workgroup who recommended the following statewide adult attainment goal:

Oregon anticipates more than 120,000 additional jobs requiring post-secondary training or education between now and 2030. In order to meet this need, 300,000 additional adult Oregonians should earn a new degree, certificate, or credential valued in the workforce during that time. Because Oregon has substantial attainment gaps among minority, low income, and rural Oregonians, the state will also commit to reducing those attainment gaps by half during the decade.

The HECC adopted the Workgroup's recommended Adult Attainment Goal in November 2018. The Goal applies to adults 25 to 64 years old who not currently enrolled in a high school equivalency program, an institution of higher education, or another post-secondary training program.

House Bill 2311 aligns state statute with how the 40-40-20 goal has been most commonly understood since its inception: as reflecting the need to improve P-20 educational outcomes for today's younger learners, ensuring that they enter adulthood ready and able to succeed in Oregon's economy and

civic life. At the same time, HB 2311 reinforces the state's commitment to ambitious educational outcomes for working-age adult Oregonians. This new Adult Attainment Goal is aligned with career trajectories, education interests, and job opportunities.

To help guide the realization of the Goal, the Adult Learner Advisory Committee (ALAC) was formed in 2019 having broad representation of post-secondary institutions both public and private and workforce training programs. The ALAC is connected through its membership and through the HECC and WTDB to all of Oregon's post-secondary universities, colleges, schools, and training programs. The ALAC will;

- Develop strategies and disseminate best practices regarding how adults gain skills outside the traditional P-20 education system pipeline;
- Develop strategies and disseminate best practices addressing education and training attainment gaps among minority, low-income, and rural adult Oregonians;
- Serve as an advisory group to connect and align multiple adult attainment efforts within the HECC (e.g. TIE Partnership Grant, prison education and training, Outreach, Adult Basic Skills, GED<sup>®</sup>, etc.);
- Investigate and provide recommendations regarding the evolving definition of "credential of value";
- Develop and maintain a list of Oregon credentials of value;
- Evaluate progress toward achievement of the Adult Attainment Goal; and
- Recommend investments to facilitate achievement of the Adult Attainment Goal (e.g. grants, scholarships, etc.).
- Act as an ongoing steering and advisory body to the HECC, WTDB, and state agency staff tasked with programs and investments related to achieving the Adult Attainment Goal during the life of the Goal or until sunset by a decision of the HECC and WTDB;
- Act as a primary resource regarding adult education and training in Oregon;
- Engage in the ongoing development and revision of the HECC and WTDB strategic plans;
- Convene stakeholders and experts as needed; and
- Report jointly to the HECC and WTDB as needed or requested.

#### Higher Education Coordinating Commission:

In addition, the HECC has responsibility for developing state budget recommendations, allocating state funding, and approving new academic programs at Oregon's community colleges and universities. Having WIOA Title I and II programs and the WTDB as a part of the HECC agency creates natural alignment with Oregon's community colleges and universities. This results in greater coordination of education and workforce development services for the benefit of all customers.

#### **Oregon Talent Assessment:**

The Oregon Talent Assessment (2018) is business and industry's determination of in-demand occupations, skills, talent, gaps, and trends. Its goal of this report is to elevate the understanding of Oregon's skills problem by creating common data and language that can be shared across employers, educators, and workforce intermediaries. Many post-secondary representatives were a part of the 2018 Talent Summit which provided insight into the report. The report itself was broadly shared and discussed with post-secondary institutions and programs. The Talent Assessment is

being updated in 2020 and the 2020 Talent Summit's theme is: What learning looks like for youth, adults, and transitioning workers in the 21st century?

#### **Industry Sector Strategies:**

Post-secondary education including community colleges, universities, K–12, and trade schools is a key partner in industry sector strategies. These provide education and training to the locally-driven sector partnerships depending on the industry's needs and goals. The key to this strategy is the explicit engagement of education at the secondary and postsecondary levels with workforce development and business. Sector partnerships make these connections at the regional level and make these partnerships successful.

#### **Partner Engagement:**

Title II providers in Oregon are currently community colleges, which leverages the connection between adult education and literacy programs and postsecondary education and training programs. Oregon actively promotes transitions to postsecondary education through investment of state leadership funds into academic bridge programs such as Integrated Basic Education and Skills Training (I–BEST), Vocational English as a Second Language (VESL), and Oregon Pathways for Adult Basic Skills (OPABS) programs. Oregon has also invested heavily in the alignment of adult education content standards with the College and Career Readiness (CCR) standards. The CCR standards and training modules have been shared with core programs and partner programs through a series of training sessions supported by the Moving Pathways Forward initiative.

Title IV, Vocational Rehabilitation and the Oregon Commission for the Blind, have MOUs with all 17 community colleges that include language around working with the college's disability services offices to ensure that our joint students get the services and accommodations they need to access educational opportunities.

Trade Act's memorandum of understandings (MOUs) with each of the 17 community colleges includes language to maintain designated point of contacts for communication as well as providing a space on campus for Trade Act Navigators (TANs) to work. TANs can be available on campus as necessary to assist new trade-affected workers navigate educational processes, assist those currently in training, and work with trade-affected workers who are in their last term of training with job readiness and work search.

The Trade Act Liaison works at the administrative level and assists with any process misalignments between education and the Trade Act program to improve the shared student experience and completion rates for trade-affected workers. The Trade Act Liaison also attends two quarterly community college meetings, the Oregon Career Pathway Alliance and the Pathways to Opportunity consortiums for continued outreach, collaboration, and education of Trade Act program processes, laws, rules, and activity levels statewide.

Oregon's Unemployment Insurance (UI) program has engagement with educational institutions through the Training Unemployment Insurance (TUI) and the Trade Readjustment Allowance (TRA) program. Both programs enable customers to receive training at education and training providers while receiving UI benefits. Eligible customers are referred to WorkSource Oregon to help determine best matches for labor market, career goals, and educational institutions during the initial stages of the application process.

## F. Partner Engagement with Other Education and Training Providers

Describe how the State's Strategies will engage the State's other education and training providers, including providers on the state's eligible training provider list, as partners in the workforce development system to create a job-driven education and training system.

Effective training often must go beyond classroom training to address all types of learners and provide hands-on experiences. Work-based learning and other innovative strategies that can help individuals understand more clearly what it is like to work in a certain industry or company are important to both improve learning outcomes and to help individuals with career exploration. Work-Based Learning (WBL) is a priority in Oregon's draft CTE State Plan. WIOA program representatives were engaged in the development of the CTE Plan and closer alignment of the CTE Plan and this WIOA Combined State Plan are anticipated in the future.

WBL is structured learning in the workplace or simulated environment that provides opportunities for sustained interactions with industry or community professionals that foster in depth firsthand experience of the expectations and application of knowledge and skills required in a given career field. Within the broad category of WBL, registered apprenticeships are a key priority. Significant effort has occurred and is planned to expand registered apprenticeship, for employers and individuals and to: (1) implement a training program to educate staff in WorkSource Oregon centers and agency central offices about Registered Apprenticeship; (2) build coalitions and relationships with industry and community partners to create and expand registered apprenticeship programs; (3) partner with LWDBs to ensure new apprenticeship programs are aligned with industry need and local sector strategies; (4) partner with secondary and post-secondary institutions and community partners to increase youth opportunities; and (5) continue to increase the number of women and minorities involved in registered apprenticeship programs by working with community partners and DHS as recruitment sources and to provide supportive services during portions of the apprenticeship training period.

Community colleges offer a variety of workforce development services that are important to the overall capacity of the state workforce development efforts. The development and expansion of creditbearing Career Pathways certificates across the 17 community colleges has been a key strategy for enhancing the training and job skills of Oregon's workforce. Currently, the community colleges offer more than 400 Career Pathway certificate programs. These certificates are defined in statute as being 15-44 credit certificates that are completely contained within a two–year Career and Technical Education degree. This means a working learner can continue to make progress toward a higher level credential without losing time or money having to take classes that are required in the higher level credential but different from those in the Career Pathway certificate.

An important goal for Title II Adult Basic Skills service providers will be in improving access to, and completion of, post-secondary credentials. CCWD, as the Title II agency at the state level, will collaborate with local Title II providers to support this goal, through investment of leadership funds and other activities. An important means to address this goal will be expansion of integrated education approaches. These include programs such as I–BEST, Vocational English as a Second Language (VESL) and Oregon Pathways for Adult Basic Skills (OPABS), as well as other programs developed in response to local needs. Local Title II providers will be encouraged to explore bridge programs and services that result in transition to post–secondary education. Local Title II providers will work with the State and local boards to clearly define career pathways across the state that promote transition of adult education students into industry recognized credentials, licenses and portable stackable certificates.

Other opportunities include designing a framework for Career and Technical Education and community colleges to collaborate on pre-apprenticeship programs developed in response to Sector Partnership demands. Funds will be prioritized for occupational training that gives people the tools that they really need to work in local businesses. By establishing a minimum requirement for funds spent on occupational training, the WTDB is promoting accountability to ensure that the workforce system is truly supporting services that benefit both job seekers and local businesses. This minimum threshold will be revisited each year of this strategic plan to adjust to the environment of the workforce system.

Overall, Oregon will leverage existing education and training resources across all six core programs and with other departments including the Department of Education, Department of Human Services, and the Business Oregon (Economic Development Department), Oregon's 17 community colleges, including providers on the state's eligible training provider list to improve the job–driven education and training system currently in place in the state.

Trade Act connects with local boards and service providers to stay updated on any scholarship or training opportunities that may be available to trade-affected workers through WorkSource Oregon. Trade Act also works with private career schools when training aligns with worker's skill gaps, and has open enrollment opportunities that may be outside of a traditional educational program start date, such as limited entry. Trade Act encourages participants to sign up for financial aid in the form of grants and scholarships and coordinates with WorkSource Oregon for supportive services beyond what is available through the Trade Act program.

## G. 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).

The HECC has responsibility for developing state budget recommendations, allocating state funding, and approving new academic programs at Oregon's community colleges and universities. Having WIOA Title I and II programs and the WTDB as a part of the HECC agency creates natural alignment with Oregon's community colleges and universities. This results in greater coordination of education and workforce development services for the benefit of all customers. It also provides opportunities to support, leverage and co-fund common priorities. The WTDB is aligning its strategic planning cycle with Oregon's legislative cycle and state budget process to maximize leverage. Work will continue to implement this transition for strategic planning.

Title II extensively leverages resources through its relationships with current providers who are responsible for supplying facilities, services, and matching funds. Title II providers are required to provide a match and CCWD, as the eligible agency, is required to uphold maintenance of effort in support of adult education and literacy programming in Oregon. In addition to the significant financial contribution made by the current Title II providers, adult education and literacy programs on community college campuses facilitate strong connections to postsecondary programs, including career and technical education and industry recognized certifications. CCWD will work to expand the use of leveraged resources through cross–training of core programs and one–stop center staff in an effort to increase referrals to adult education and improve access to educational services for low–skilled adults.

Trade Act connects with the State Apprenticeship Liaison on available apprenticeship opportunities and educates participants on findings. The State Apprenticeship Liaison provides training to Trade Act staff on apprenticeship and navigation of websites to enable staff to improve service to trade-affected workers interested in apprenticeship opportunities. Trade Act staff also attend Joint Apprenticeship Training Center Apprenticeship Coordinator quarterly meetings held on various apprenticeshiptraining sites to increase knowledge on application process and learn of open application timelines.

Trade Act supports industry-supported credentials that enhance employment in sectors supported by WSO areas. Trade Act Navigators and Regional Business Service Trade Adjustment Assistance Specialists work collaboratively with local boards, regional solutions centers, workforce partners, economic development, and training providers to increase talent development options and on-the-job training opportunities based on knowledge gained from employer outreach.

Oregon's UI program encourages people who may be eligible for various types of educational programs to take advantage of them through WorkSource Oregon. Depending on availability, while school attendance may pose an issue for UI claimants to maintain eligibility for benefits, UI merit staff

supports customers to help determine the best solution in order for them to achieve success in their short and long-term employment goals through education.

Oregon's UI program also provides information about Unemployment Insurance (UI) benefits available through the Training Unemployment Insurance (TUI) and the Trade Readjustment Allowance (TRA) programs. Workers have the option of applying for:

- 1. TUI when they lose their job through no fault of their own and are determined to be dislocated workers;
- 2. TRA when they are laid off as a result of foreign trade and their employer has been certified by the U.S. Department of Labor as trade-affected.

Oregon leverages resources to increase educational access through sharing information with UI claimants about the programs through public service announcements, press releases, recorded messages on call center phone lines, hard copy brochures, posters, mailers, digital displays, social media, and website messaging.

Pursuing Additional Resources to Support Connecting Youth to Education and Work Partnerships between the Oregon Workforce Investment Board and local workforce development boards around better connecting youth to education and work continue to grow and flourish. State and local strategies that flow from these partnerships pursue additional, area appropriate funding and resources. One example involves the Oregon Youth Corps (OYC) and local workforce boards attempting to increase summer and year–round work experiences for youth ages 14 to 24. These strategies employ a competency–based approach to workforce and academic preparation including requirements for youth to demonstrate skills along a continuum of college and career readiness.

### H. 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.

In 2014, an OWIB (now WTDB)-HECC taskforce recommended that all middle 40 degrees, credentials, licensures and certifications issued by accredited public and private institutions, registered apprenticeships, recognized industry associations or third party vendors should be included in what is counted toward achievement of the state's 40–40–20 goal. The taskforce also recommended that the state count the number of Oregonians with credentials and track all middle 40 credentials earned, because there is value in knowing which credentials have been awarded and how these tie to the requirements of the labor market and businesses. Building on this work, Oregon established a new Adult Attainment Goal in 2018. To help guide the realization of the Goal, the Adult Learner Advisory Committee (ALAC) was formed in 2019 having broad representation of post-secondary institutions both public and private and workforce training programs. The ALAC will investigate and provide recommendations regarding the evolving definition of "credential of value", develop and maintain a list of Oregon credentials of value, and evaluate progress toward achievement of the Adult Attainment Goal.

Title II will be involved in improving access to postsecondary credentials at the state and local levels. CCWD as the eligible agency will invest state leadership funds to expand academic bridge programs for individuals transitioning from adult education to postsecondary education, through research– based programming such as Integrated Basic Education and Skills Training (I–BEST), Vocational English as a Second Language (VESL), and Oregon Pathways for Adult Basic Skills (OPABS). Local adult education and literacy providers will be encouraged to explore bridge programs and promote transition to postsecondary education when possible. Title II will work with the state and local boards to clearly define career pathways across the state to promote the transition of adult education students into industry recognized credentials, licenses and portable stackable certificates. In September 2015, the Oregon Workforce Investment Board (OWIB, now WTDB) approved two motions regarding the requirements for expenditures related to training services, as provided by local workforce development boards. This document clarifies and further defines the OWIB motions and provides guidance for planning and implementation (beginning July 1, 2016). Click here for more details on Minimum Training Expenditures. By establishing a minimum requirement for funds spent on occupational training, the OWIB is promoting accountability to ensure that the workforce system is truly supporting services that benefit both job seekers and local businesses. This minimum threshold will be revisited each year of this strategic plan to adjust to the environment of the workforce system.

The workforce system has built coalitions and relationships with industry and community partners to create and expand registered apprenticeship programs through two apprenticeship focused positions at OED and the Oregon Department of Education (ODE). OED will partner with local workforce boards to ensure that technical assistance and support for new apprenticeship programs are aligned with industry need and local sector strategies. ODE will partner with secondary and post–secondary institutions and community partners to increase the opportunities for youth to transition from high school into an apprenticeship or a pre–apprenticeship program. OED and the Apprenticeship Training Division will continue to work towards increasing the number of women and minorities involved in structured work–based learning and registered apprenticeship programs by working with community partners and the Department of Human Services to provide supportive services during portions of the apprenticeship training period.

Trade Act also supports industry supported credentials that enhance employment in sectors supported by WSO areas. Trade Act will collaborate with the Apprenticeship Program Liaison on available apprenticeship opportunities and educate participants on findings.

Oregon's Unemployment Insurance (UI) program also has engagement with postsecondary educational institutions with regard to the Training Unemployment Insurance (TUI), the Trade Readjustment Allowance (TRA), and the apprenticeship programs. The programs enable customers to receive training at postsecondary institutions while receiving UI benefits.

## I. Coordinating with Economic Development Strategies

Describe how the activities identified in (A) will be coordinated with economic development entities, strategies, and activities in the State.

The workforce system will establish and enhance strategic partnerships with economic development organizations to assist with the development and creation of jobs. Business representatives from multiple partners including economic and workforce development partners, work together to coordinate services across their region, and target specific industries based on information from economic development partners. Additionally, workforce analysts work together with economic development professionals to enhance and improve business recruitment, retention, and expansion.

CCWD and local area Title II providers will fund allowable activities under Adult Education and Family Literacy ACT (AEFLA). Title II providers will align activities with local area plans, such as sector strategies and career pathways. These adult education and literacy activities will also be coordinated across the core programs and partners through WSO center participation, referrals, and co– enrollment where feasible.

Trade Act staff will coordinate with local boards, regional solutions centers, workforce partners, economic development, and training providers to create industry driven on-the-job training opportunities and talent development options based on knowledge gained from employer contacts and meetings.

Regional Solutions is an innovative, collaborative approach to community and economic development in Oregon. The state, in partnership with Oregon colleges and universities, established Regional Solutions Centers throughout Oregon. Starting at the local level to identify priorities, each center works from the bottom up to solve problems and complete projects. These centers integrate state agency work and funding to ensure that projects are finished as quickly and cost-effectively as possible.

## 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—

Oregon's State Operating Systems and Policies

# 1. The State operating systems that will support the implementation of the State's strategies. This must include a description of–

A. 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.)

State operating systems to support implementation of the state's strategies are primarily divided into three categories:

- Labor Market Information
- Data Collection and Reporting Systems
- Operations and Management Systems

#### Labor Market Information:

The Oregon Employment Department's Workforce and Economic Research Division provides accurate, reliable, and timely information about Oregon's state and local labor markets. The division's goal is to provide quality information that helps our customers make informed choices. Workforce development policy makers are a key research customer group, particularly serving the labor market information needs of state and local workforce development boards.

The division's efforts focus on direct employer surveys, information from tax records, analysis of the data, and dissemination through publications, presentations, and responses to customer requests. Most labor market information is available online allowing staff more time to focus on custom analysis and answering challenging questions about the labor market.

Oregon has long been a leader and innovator in labor market information, with activities and projects such as the Workforce Analyst program, the national award–winning QualityInfo.org internet site, and our innovative and highly regarded special publications.

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

Data-collection and reporting processes used for all programs and activities, including those present in one-stop centers.<sup>10</sup>

[10] For the PY 2016 state plan, descriptions of data collection and reporting processes need only include currently known indicators.

Oregon's Performance Reporting Information System (PRISM) was established to collect, analyze, and report on workforce development services, customers receiving these services, employment outcomes, median earnings, credential attainment and measurable skill gains after receiving services.

The WorkSource Oregon Management Information System (WOMIS) is the statewide electronic information environment that supports the mission and vision of WorkSource Oregon. The WOMIS environment is a network of applications that serve job seekers, staff, and employers. Additionally data from the various applications are used for required federal program reporting, operational reporting, and WSO performance reporting. Specifically, the WOMIS environment includes applications that support:

- Customer Registration and Program Eligibility Determination
- Labor Exchange (Job Matching and Referral and Business Services) (Wagner-Peyser)
- Trade Act Assistance
- Workforce Training and Adult, Dislocated Worker and Youth Case Management (Title I)
- State and Federal Reporting

#### **Customer Registration and Program Eligibility Determination:**

WOMIS includes a Common Registration module that all WorkSource Oregon customers must complete to receive staff-assisted services. Jointly managed by the Oregon Employment Department which administers Wagner-Peyser (Title III) and Trade Act and the Office of Workforce Investments (OWI) which oversees Title I grants. The Common Registration module is used to:

- collect contact information and required data elements and demographic information for federal and state reporting purposes;
- determine eligibility for Wagner-Peyser (W-P), Adult and Dislocated Worker (DW) programs, other federal programs such as Veterans and Migrant Seasonal Farmworkers (MSFW);
- create a job seeker profile for job-matching purposes; and
- "push" information to the local areas' external Title I customer management and tracking system (I-Trac).

Common Registration is also used to determine a common exit date for federal reporting purposes. The exit date is calculated when 90 days have elapsed with no qualifying staff-assisted service from any one of the participating programs to include Adult and Dislocated Worker (Title I), Wagner-Peyser (Title III) and Trade Act.

#### Labor Exchange (Job Matching and Referral and Business Services):

The Oregon Employment Department developed and manages iMatchSkills, a web-based system that connects job seekers and employers; all customers have 24/7 access to the system. Through iMatchSkills, job seekers can create their own customized profile that includes work and education history, and job preferences. Job seekers can choose to be contacted directly by employers if they are selected in a job match. Job seekers can also compare themselves to requirements for a job, and then identify gaps that the WorkSource Oregon system can help bridge through training and education programs.

This system also provides a host of features for employers. Through iMatchSkills, employers can set up an online account to post and manage their own job listings. In addition, employers can match their job listings, view the skills and qualifications of potential candidates and contact those they consider to be a good match.

iMatchSkills also functions as the case management and tracking system for a number of workforce programs to include Reemployment Services and Eligibility Assistance, SNAP Employment and Training, Veterans, Migrant and Seasonal Farmworkers, and Foreign Labor Certification.

iMatchSkills was developed by and is managed by OED.

#### Trade Act Assistance:

The Trade Act program is a state-administered federal program which offers benefits and services to help trade-affected workers prepare for and obtain suitable employment. OED developed and manages the Trade Act Assistance Management Information System (TAAMIS), a web-based application that supports the administration of participant activity while in Trade Act programs. It is a staff access only application. It takes data from Customer Registration as well as affected worker lists from trade-affected companies and UI data.

#### Workforce Training and Adult, Dislocated Worker and Youth Case Management (Title I):

I-Trac is the statewide management information system that supports case management and tracking of employment and training services for the Adult, Dislocated Worker, and Youth programs. It also reports data to OWI for federal reporting purposes. Customer data collected through the state's Common Registration application is shared with I-Trac to facilitate the delivery of Title I services and prepare federal reports. I-Trac is a staff-access only application and was developed by and is managed by Worksystems, Inc.

#### State and Federal Reporting:

All WIOA Title II data are reported both locally and statewide using TOPSpro Enterprise and reported to the federal Department of Education through the National Reporting System (NRS). Local programs have ongoing data analysis and program improvement opportunities through their performance management software, data quality checklist, database administrators' training, ongoing state training, and annual reporting requirements. Each June, programs submit a Strategic Framework, an evidence–based program evaluation, coupled with a detailed program improvement plan for the next year. In August, local providers submit their federal statistical tables, and the local data quality standards checklist. This process enables local programs to identify and correct data anomalies. Local program directors also identify common performance issues that local programs and state staff address collectively throughout the year.

The state provides technical assistance, facilitates state committees on assessment and data, and engages in ongoing data analysis to supplement annual training in order to ensure accurate data collection and reporting. State data analysis begins with the export of local program data in July.

Initial analysis of the state–aggregated database includes a review of a TOPSpro Federal Tables Summary Audit Report. Elements of the audit report identify the total "selected" students available; the number of students dropped, based on nine "drop reasons;" and establishes the number of students who "qualify" for the Title II Federal Report. Similar reports are developed for each grant type: Comprehensive Services, EL/Civics, Corrections, and Outreach Tutoring. The primary data system used for analysis and tracking relating to Oregon community colleges and students is the Oregon Community College Unified Reporting System (OCCURS). The OCCURS 2.0 data system provides stricter data security, ease of interfacing for end users at the community colleges, increased data reliability and validity, all while allowing external stakeholders the ability to query parts of the system via a web-based datamart.

A participant must receive a qualifying service from any eligible program at least once every 90 days to keep the common episode open. If a qualifying service is not received, the episode will exit. The customer will have to re-register with WSO to determine current program eligibility and start a new common episode.

Data collected through the state's Customer Registration system, iMatchSkills, I-Trac (managed by Worksystems, the Portland-Metro Workforce Development Board) and other data systems to include the Trade Adjustment Assistance Management Information System is used to generate the Participant Individual Record Layout (PIRL) for Titles I and III and Trade Adjustment Assistance federal reporting purposes.

Employers are required to report wage records to the UI program on a quarterly basis. This information includes the number of hours worked per quarter by employees. At the time an initial claim for Unemployment Insurance (UI) is filed in Oregon, wage records are used to establish eligibility for UI. This data is also used by several programs, including Employment Services, OED's Workforce and Economic Research Division (for developing labor market information), and other state programs (such as Vocational Rehabilitation for performance reporting). Data is collected from the initial claim to establish customer records for WSO center partners. Using the records, a profile for the customer is established which is used by Employment Services (ES) to gather information about the success of services offered in the one stop locations.

Wage data is used in Oregon for many purposes, such as measuring the effectiveness of various interventions designed to help people become reemployed or better skilled, and understanding the composition of Oregon's labor market and industries and seeing trends that can help target services. UI data is also used to help some partner agencies determine whether individuals are eligible for various programs they administer.

#### **Operations and Management Systems:**

The Oregon Employment Department Division of Workforce Operations works to match the needs of Oregon's employers with skilled Oregonians looking for employment and assist job seekers in finding jobs. The division operates several federally mandated programs and runs field offices throughout the state. Workforce Operations works closely with UI to support the reemployment of UI claimants and ensure the integrity of benefit payments, as well as with the Workforce and Economic Research Division.

#### Vocational Rehabilitation:

VR and OCB will be working on independent agreements and procedures to obtain data from our post-secondary and educational partners through data sharing agreements. VR/OCB counselors will obtain documentation and data for the purposes of reporting on credential-attainment standard and skills-gain performance standard. As the system and partnerships evolve, including within the one stop centers, VR/OCB, through negotiated agreements, will receive and share appropriate data.

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

The WorkSource Oregon (WSO) system integrates the services provided by the Wagner–Peyser Act administered by the Oregon Employment Department (OED) and the Workforce Innovation and Opportunity Act (WIOA) Title I programs administered by the state's Office of Workforce Investments.

In July 2020, Oregon will discontinue its procedure for automatically co-enrolling customers in both Wagner-Peyser and WIOA Title I Adult and Dislocated Worker programs at the point they engaged in receiving WSO services. Eligible participants will become co-enrolled in in both Title III and Title I programs when they receive the first qualifying Title I service. This change will significantly lower the number of customers co-enrolled in Titles I and III, when compared to previous program years.

The WSO standards will be incorporated into state monitoring processes and local areas will be held accountable to their successful implementation in every WSO location in the state. The Workforce and Talent Development Board (WTDB) adopted the WSO Operational Standards in 2018.

The WTDB, during its strategic planning process, developed five new Imperatives with associated Objectives and Initiatives to address the current needs of the workforce system and customers. The local workforce development boards are key implementation partners of these goals and strategies and form collaborative relationships and Memorandums of Understanding (MOUs) at the local level to deliver services that align with the state's strategies and that abide by state policy.

Oregon has a policy that specifically addresses WIOA Youth eligibility, has posted guidance related to documenting the eligibility criteria of all WIOA title I and title III participants, and is revising its WIOA title I policy on registration, program eligibility, and common exit. These efforts support co-enrollment and common service delivery, although a "common registration" process (universal intake) that includes Title II and Title IV customer data and eligibility requirements continues to pose challenges at both the programmatic (data confidentiality/sharing) and programming (MIS/IT architecture) levels.

As new policies are developed and published, they will be posted on a publically accessible website. Oregon's current WTDB and WIOA title I policies and guidance can be found here.

The core programs will work to craft policies over time to support the state strategies, including coenrollment practices and development of a universal intake. At this time, the core programs do not have a shared case management system, data system, or shared in-take practices. Title II will be invested in the development of state policies that support development of the state's customer-centric workforce system.

Title IV, VR and OCB has been aligned policies as appropriate to ensure that the intent of the act is honored. Although the current management information system common intake practices currently used by Titles I and III are not practical for VR and OCB, local areas will work with partners to simplify joint referral and information sharing to ensure alignment and non–duplication of services.

When customers enter a WSO Center, they are greeted within a minute by WSO staff. Their needs are assessed and the customer is immediately directed to the dedicated WSO staff who can meet their stated need. The intake process occurs with dedicated WSO staff as they continue to listen to the needs of the customer, enroll the customer and document next steps the customer will take to become re-employed.

The WorkSource Oregon (WSO) system designed and implemented a set of standards designed to increase customer service at all points of the customer experience, including the intake process. Oregon has adapted a G.L.A.D. (Greet/Listen/Assess/Direct) approach to the customer intake process so that each customer receives an immediate and individual assessment of their needs and are then connected to WSO staff who can begin addressing those needs within 15 minutes of entering the WSO center.

WSO uses iMatchSkills to facilitate in the administration of the public labor exchange in Oregon. Job seekers registering in iMatchSkills create a profile that includes work history, licenses and certifications, occupational preferences and resume. This profile is used to match job seekers to jobs. While job seekers are encouraged to self-register in iMatchSkills, translation assistance or data input by means of staff assistance are available for those who request accommodation.

## 3. State Program and State Board Overview

## A. 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 Workforce Development System is the web of programs and providers, both public and private that prepare workers and job seekers with the information and skills needed to find or maintain employment, and assist employers to employ skilled workers or to increase the skills of their existing workforce. The workforce system supports the equitable prosperity of individuals, business and communities consistent with the Oregon Workforce and Talent Development Board's Vision.

There are four state agencies directly responsible for the implementation of the major programs involved in the Workforce Development System in Oregon. These agencies include the Oregon Employment Department, the Office of Workforce Investments and the Office of Community Colleges and Workforce Development within the Higher Education Coordinating Commission (HECC), the Oregon Commission for the Blind (OCB) and the Department of Human Services – Self Sufficiency Programs and Vocational Rehabilitation.

## B. State Board

Provide a description of the State Board, including-

The governing and advisory boards for the Workforce Development System include the Oregon Workforce and Talent Development Board (WTDB) and nine local workforce development boards.

The WTDB is the hub for solutions in the development of Oregon's Talent Marketplace. The WTDB is a key resource and national leader on the future of work including the skills required to propel Oregon businesses forward and sustain individual and community prosperity. It is the acknowledged leader in advising the Governor on the interconnection and alignment of education, training, and workforce development. Because the WTDB is made up of leaders representing business and industry, labor, community-based organizations, Oregon legislature, local government, and state agencies, it is uniquely positioned as Oregon's workforce and talent development expert.

The WTDB's vision is *equitable prosperity for all Oregonians*. To realize this vision, the WTDB advances Oregon through meaningful work, training, and education by empowering people and employers. The Oregon Workforce and Talent Development Board (WTDB) enables meaningful work for all Oregonians by:

 Leading and communicating a long-term vision for Oregon that anticipates and acts on future workforce needs;

- Advising the Governor and the legislature on workforce policy and plans;
- Aligning public workforce policy, resources, and services with employers, education, training and economic development;
- Identifying barriers, providing solutions, and avoiding duplication of services;
- · Promoting accountability among public workforce partners; and
- Sharing best practices and innovative solutions that are scalable statewide and across multiple regions

The state board membership roster can be found on the WTDB website.

The WTDB and its staff will be assisted by interagency teams in carrying out its work. In particular, the Workforce System Executive Team (WSET) provides inter-agency implementation leadership and core program review of any policy or program recommendations before they are submitted to the WTDB Executive Committee and full board for consideration. The WSET also has staff teams to assist it in the development of options and recommendations. Staff representatives WSET members also participate in WTDB task forces to support implementation of state board functions.

Oregon has nine local WDBs. These boards have significant autonomy over programming in their jurisdictions and are comprised of business leaders within the community, other community leaders, organized labor, educational institutions and elected officials. The local WDBs have special obligations concerning programming for out of school youth and skills–deficient youth.

#### i. Membership Roster

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

#### **Representatives of Business:**

Ken Madden (Chair), Madden Industrial Craftsmen, Inc.

Anne Merseau (Vice Chair), Portland General Electric (PGE)

Craig Campbell, OMIC Research and Development

Lauren Corbett, Adidas

Alex Lemieux, Resers Fine Foods

Julie Lewis, Pacific Corp

Soundharya Nagasubramanian, Welch Allyn

Sabrina Parsons, Palo Alto Software

Fred Pool, Quorvo

Debbie Radie, Boardman Foods

Cathy Reynolds, Legacy Health

Melinda Rogers, Northwest Natural

Jimmy Swanson, Swanson Timber

Venkat Venkatraman, Nvidia Corp

Laurie Cremona Wagner, SAP

Vacant Position – Construction

Vacant Position – Forest Products Vacant Position – Healthcare Vacant Position – Sportswear/Apparel Vacant Position – Sportswear/Apparel

#### **Representatives of the Workforce:**

Rod Belisle, NECA-IBEW Electrical Training Center Shari Dunn, Dress for Success Oregon Corey Nicholson, Oregon AFL-CIO Dwain Panian, Int. Assoc. of Machinists and Aerospace Workers Chelsea Watson, Oregon AFL-CIO

#### Representative of the Governor:

Lindsay Capps, Governor's Office

#### Representatives of the Legislature:

Michael Dembrow, Senator Kim Thatcher, Senator Paul Holvey, Representative Vacant Position – Representative

#### **Representatives of Government:**

Ben Cannon, Higher Education Coordinating Commission (HECC) – Titles I and II
Kay Erickson, Oregon Employment Department (OED) – Title III/Wagner-Peyser
Keith Ozols, Department of Human Services Office of Vocational Rehabilitation – Title IV
Vacant Position – Business Oregon
Patty Dorroh, County Commissioner – Harney County
Doug Hunt, County Commissioner – Lincoln County

#### Others Designated by the Governor:

Bridget Dazey, Oregon Workforce Partnership (OWP) Mark Mitsui, Portland Community College Rhonda Rhodes, CTEC High School

#### **Ex Officio Members:**

Jody Christensen, Oregon Governor's Office Regional Solutions – Pending Jana Bitton, Oregon Center for Nursing – Pending Tony Frazier, KROC Center – Pending

Dan Haun, Department of Human Services Self Sufficiency Programs

Marc Overbeck, Oregon Health Authority - Pending

#### ii. Board Activities

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

The goal of the WTDB's one-page 2020–2021 Strategic Plan is to create a north star and road map for the workforce system to capitalize on its strengths, identify and address obstacles, and promote continuous improvement of services through actionable recommendations and guidance.

This Plan identifies five key Imperatives:

- Create a culture of equitable prosperity;
- Increase understanding and utilization of the workforce system;
- Identify and align strategic investments;
- Position Oregon as a national leader; and
- Create a Board culture that is resilient and adaptable and flexible to a changing economy

Each of these Imperatives will be guided and directed by an Imperative Team comprised of three WTDB members whose interests and priorities line up with each imperative. These Teams will decide next steps to accomplish all Objectives and Initiatives and coordinate with WTDB staff, agency leadership, local workforce development boards (LWDBs), and other key stakeholders.

These Imperative Teams will also work in concert with the WTDB and the WTDB's Executive Committee and task forces. There are three key Values that will drive all of this work. The WTDB will be:

- Inclusive (the WTDB invites and represent all voices to strengthen our workforce system);
- Collaborative (the WTDB proactively engage all stakeholders as a hub for consensusbuilding); and
- Bold (the WTDB courageously takes risks to influence and persuade action).

Although the WTDB's Imperatives, Objectives, and Initiatives will help focus local workforce development boards, but are not intended to act as an implementation plan for local services. LWDBs will determined how the work is done, creating plans that will work for the unique characteristics of each area.

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

## A. 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.

Oregon will be using the federal measures as prescribed in WIOA. Available data supports the evaluation of programs at the state and local levels. The service delivery model and economic conditions will be assessed annually against the outcomes achieved during the prior year. Options for continuous improvement will be discussed at the state and local area levels, and performance targets will be adjusted accordingly. Oregon is researching the use of additional indicators to monitor service delivery in real-time, improve outcomes, and respond to immediate needs of our local communities. Once any additional measures are developed, tested, and approved, the measures will be applied and used to monitor activities on a timely basis. The goal is to support the real-time adjustment of resources and service delivery to match local demand.

Oregon continues to work toward state and local workforce development agencies and boards shifting from a compliance– and program–specific orientation to a highly integrated, outcomes– based system that makes value–added investments based on the WSO standards of performance and community needs. To the extent that Oregon can achieve this, the workforce system will assure that all workforce programs operate efficiently, without unnecessary duplication, and leverage resources. The WorkSource Oregon Operational Standards provide the minimum–level content/services(s) required at all WSO centers. They also build–in an accountability mechanism to ensure that this effort will come to fruition across the entire state. Finally, they offer an opportunity to work together to continually improve the system, engage new partners, and better serve Oregon's job seekers, workers and businesses.

CCWD will conduct annual assessments of Oregon's aggregate Title II performance and performance by local providers. Adult education and literacy providers will be evaluated by individual provider, rather than by local area performance. Overall program quality will be measured by student persistence, retention, and transition to either employment or postsecondary training. Title II performance evaluations will be supported by: regular submission of programmatic performance numbers, quarterly reporting of programmatic activities, and annual financial audit. Regular monitoring of program quality will be used for continuous improvement activities, allowing CCWD to provide technical assistance based on assessment results.

Title II will assess WSO delivery system partner program services based on the number of crosstrained staff, appropriate referrals, and participant co–enrollment. WorkSource partnerships will also be qualitatively reviewed within Oregon's local areas through quarterly programmatic reporting of Title II providers.

VR (general) has incorporated the accountability measures into our rolling monthly performance reports and our quarterly business reviews. Given the long term nature of the measures, proxy measures have been put in place to make managing to the measures achievable. The monthly performance reports are broken down into the fourteen branches for VR. The quarterly business reviews are a statewide roll–up of the outcome data to date. These two reports give us a local view and a chance to review statewide trends. In this way, local trends can be identified and we can easily identify areas where higher performance may indicate the presence of a best practice that needs to be duplicated.

Over the first two years of this unified plan, local branches will work to develop mechanisms to set local expectations of performance and strategies to enact local VR plans that are congruent with the local WDB plans. These plans will be used to manage the effectiveness of the programs. VR is currently revamping its quality assurance processes and will use these statewide to help ensure that service delivery is done to a standard that is consistently high across the state. New service contracts will allow VR to better measure the effectiveness of purchased services through individual providers and service category.

OCB has integrated the accountability measures into its operational performance measurements process agency services. Specific activities, interventions or new programming are evaluated within the context of the WIOA performance accountability indicators. OCB evaluates progress along performance indicators on a monthly basis, and will incorporate changes in service delivery strategies based on measurement evaluations. Progress is reviewed and evaluated at an integrated service team level and at a management level to identify trends or variations in performance that can be identified and analyzed and then incorporated into service delivery for outcome measure improvement.

The Temporary Assistance for Needy Families (TANF) program is an essential part of the safety net for vulnerable Oregon families. TANF stabilizes families and prepares parents for employment that sets them firmly on a pathway out of poverty, and into economic stability and self–reliance. TANF provides supports to keep children safe, healthy and thriving within their own families, financial assistance to stabilize households and training and job search services to help parents find and retain employment.

A combination of policy changes and a targeted reinvestment strategies will improve outcomes for children and families. These reinvestment proposals include reducing the number of participants affected by the "benefits cliff" when they become employed, simplifying eligibility requirements to strengthen family connections and stability for children. These strategies also include expanding family stability services, expanding education and training opportunities, increasing flexibility in support services to support families in skill building and employment readiness activities, and improving program capacity to provide strength–based, customized and outcome–focused case management. Much of this strategy is carried out through a network of providers inclusive of WSO partners, numerous non-profit and community-based organizations around the state.

### B. Assessment of One-Stop Partner Programs

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.

To position the workforce system in Oregon for relevance and growth there must be clarity about what WorkSource Oregon is at both the state and local levels, what it offers, and how existing partnerships bear a shared responsibility to create value to additional partners in the future. The WSO Operational Standards Self–Assessment Report and subsequent development of the WSO Operational Standards will ensure that much of this work is done and continues to improve service and performance within the workforce system.

System wide, the WorkSource Oregon Standards will be utilized to assess the delivery system of partner program services, including but not limited to partner programs outlined in this Combined State Plan. Progress toward, and achievement of, these 80 workforce standards will tracked, reviewed, and managed to better assess and improve outcomes taking into account both local and regional planning strategies and goals.

Oregon is currently developing a certification process that incorporates these WSO Standards to ensure consistency, ongoing system improvement, and federal, state and local compliance.

There are other additional assessments used to evaluate partner programs across the system. One of the key programs managed through the Oregon Employment Department (OED) to help unemployment insurance claimants become reemployed is the Reemployment Services and Eligibility Assessment (RESEA) program funded through a grant from the U.S. Department of Labor. This program is evaluated annually using a combination of federal performance measures and ad– hoc reports developed using OED's business analysis software. An evaluation form is also available for WSO centers to assess the quality and effectiveness of staff engagement with RESEA customers. RESEA program data including staff and customer feedback is evaluated by a standing workgroup

that focuses on strengthening claimant reemployment efforts and streamlining agency operations and communications to better serve claimants in one stop centers.

The Trade Act program data is validated for the PIRL quarterly report through TAADI (Trade Adjustment Assistance Data Integrity) tool, quarterly file audits, and customer surveys.

Oregon will assess performance for the Unemployment Insurance (UI) Program through the State Quality Service Plan (SQSP)). The SQSP includes Benefits Timeliness and Quality (BTQ) measures, the Tax Performance System (TPS), Cash Management measures, the Benefit Accuracy Measurement (BAM), and Benefit Payment Control (BPC) measures.

## C. 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.

An analysis of Oregon's WorkSource offices was conducted and will be used to implement a set of service and performance standards. The partners at WorkSource Oregon, the one stop centers, have developed statewide operational standards for the centers. The standards recognize that workforce areas are starting at different places and the ability to meet all standards will vary across the state. The assessment was used to determine a strategy for implementing the statewide operating standards and will continue to help determine how well we are striving toward full implementation of the standards by region.

Previous Title II assessments focused primarily on enrollment and measurable skill gains, such as GED completions. Over the past two years, Title II enrollment in Oregon has decreased from 16,204 in 2013–2014 to 13,882 in 2014–2015. The number of hours participants received services was nearly identical during the two–year time period, 1,666,063 hours in 2013–2014 and 1,624,815 hours in 2014–2015. On average, Title II students received services for over 100 hours a year. The percentage of pre– and post–tests was also similar between 2013–2014 and 2014–2015; approximately 57% of enrolled participants completed pre– and post–tests. The 2014–2015 outcome measures are not yet available. In 2013–2014, Title II outcomes measures totaled 710 GED completers, 2,578 participant transitions to postsecondary education, and 1,699 participants entered employment. Under WIOA, overall Title II program quality will be measured by student persistence, retention, and transition to either employment or postsecondary training. Title II performance evaluations will be conducted on an annual basis with quarterly performance reporting to support continuous improvement activities. CCWD will then adapt its strategies to focus on program quality and effectiveness.

Title IV VR regularly uses evaluations of data and qualitative information to measure the effectiveness of our program. Evaluations completed in the last two years have resulted in such things as: a revamping of our statewide procurement process for job placement service, changes to the job placement service delivery model, training to help staff move clients into plan faster, trainings on specific disability barriers, cross trainings with other agencies to ensure better partnerships, changes to business practices using the LEAN model, and the piloting of some new evidenced –based best practices around transition.

Title IV OCB uses data and qualitative information from client and employer surveys, Certified Statewide Needs Assessment gathered feedback, and from data aggregated and analyzed as a part of our process improvement strategies. OCB uses an internal performance management system to drive foundational activities that have impacts on measured performance and positive client outcomes. These process improvement activities and strategies are integrated into OCB's larger strategic planning.

Prior assessment of the Reemployment and Eligibility Assessment (REA) program shows that it has been effective in helping speed claimants return to work and in preventing and detecting unemployment insurance (UI) overpayments.

## D. 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.

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. The WSET will determine the WIOA core program activities that will be evaluated and researched. The WSET is both an operational and decision-making group regarding workforce system project development and implementation. Through the leadership of this group, projects will be determined, assigned, coordinated amongst state, agency staff and local partners responsible for both the administration and implementation of WIOA and core programs.

## 5. 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.

## A. 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—

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

Currently, the Office of Workforce Investments (OWI) distributes Title I formula funds for Youth to local areas using three equally weighted factors:

- One-third on the basis of the relative number of unemployed individuals in areas of substantial unemployment in each workforce investment area, compared to the total number of unemployed individuals in areas of substantial unemployment in the State;
- One-third on the basis of the relative excess number of unemployed individuals in the area compared to the total excess number of unemployed individuals in the entire state; and
- One-third based on the relative number of disadvantaged youths/adults compared to the total number of disadvantaged youths/adults in the entire state.

OWI also uses a hold-harmless formula so that no local area receives less than 90 percent of the average allocation percentage of the local area for the two, preceding fiscal years. Amounts necessary for increasing such allocations to local areas to comply with the hold-harmless are obtained by ratably reducing the allocations to be made to other local areas.

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

Currently, the Office of Workforce Investments (OWI) distributes Title I formula funds for Adult to local areas using three equally weighted factors:

- One-third on the basis of the relative number of unemployed individuals in areas of substantial unemployment in each workforce investment area, compared to the total number of unemployed individuals in areas of substantial unemployment in the State;
- One-third on the basis of the relative excess number of unemployed individuals in the area compared to the total excess number of unemployed individuals in the entire state; and
- One-third based on the relative number of disadvantaged youths/adults compared to the total number of disadvantaged youths/adults in the entire state.

OWI also uses a hold-harmless formula so that no local area receives less than 90 percent of the average allocation percentage of the local area for the two, preceding fiscal years. Amounts necessary for increasing such allocations to local areas to comply with the hold-harmless are obtained by ratably reducing the allocations to be made to other local areas.

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

Currently, the Office of Workforce Investments (OWI) allocates and distributes dislocated worker funds to local areas based on the average distribution of the data that reflects the following factors as they relate to the workforce areas (this average distribution assumes all factors are weighted equally):

- Total Unemployed
- Excess Unemployed
- UI Exhaustees
- Total UI Claimants
- Declining Industries

The resulting average distribution per workforce area will be applied to the formula dollars the state will distribute to the areas. A hold-harmless formula is also applied to dislocated worker funds distributed to local areas.

### B. For Title II

i. Describe how the eligible agency will award multi-year grants or contracts on a competitive basis to eligible providers in the State, including how eligible agencies will establish that eligible providers are organizations of demonstrated effectiveness

CCWD will award competitive grants to eligible providers on a three-year cycle in accordance with the requirements of section 231 of WIOA. Eligible Title II provider applicants will be required to demonstrate effectiveness by providing appropriate documentation including:

- Description of program activities and services provided to both low-skilled adults and English language learners;
- Description of how the organization facilitates student transitions from adult education to either employment and/or postsecondary education;
- Outcome data for using the WIA definitions or similar metrics such as educational level gains, GED completions, and transitions to employment and/or postsecondary training; and
- Successful completion of a fiscal audit for the two preceding years.

The competitive Request for Application (RFA) process will be conducted in an open and fair manner. All information related to the RFA will be provided on a publically accessible website.

ii. Describe how the eligible agency will ensure direct and equitable access to all eligible providers to apply and compete for funds and how the eligible agency will ensure that it is using the same grant or contract announcement and application procedure for all eligible providers

CCWD will ensure that all eligible providers have direct and equitable access to apply for Title II funds by:

- Using the same grant announcement, application, and proposal process for all eligible providers;
- Providing information about the RFA to any eligible agency that requests it;
- Incorporating the considerations specified in section 231(e) of WIOA in the review criteria; and
- Evaluating all applications using the same rubric and scoring criteria.

## C. 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.

Title IV Vocational Rehabilitation and the Oregon Commission for the Blind decide through mutual agreement on the distribution of funds between the two agencies. This agreement is reviewed periodically to ensure that the service, staffing, and operational needs of both agencies are adequately met based on the availability of funds. Changes to the current funding levels can be requested by either agency at any time and changes can be made based upon mutual agreement.

## 6. Program Data

### A. 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.

### i. 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

In 2015, the Oregon Employment Department began a multi-year initiative focused on transforming the agency's business processes and core technology systems supporting the receipt of unemployment insurance taxes, payment of unemployment insurance benefits, and delivery of employment services. Through this effort the agency seeks to enhance customer service, including better integration with partners and increased access to timely and accurate data. Additionally, the new platform will improve functionality and flexibility of these systems while lowering the risk of a major technology failure and improving security. The Modernization Program will achieve its goals and objectives through the execution of multiple projects.

Since 2015 the Employment Department has contracted with the Information Technology Support Center (ITSC) to conduct and complete a feasibility study; initiated and completed workgroups to gather and document information about our systems, data exchanges, and interfaces; and released and gathered information from two requests for information (RFIs) for the unemployment insurance and workforce projects among other tasks. The information gathered and documented from these efforts has been foundational to defining the scope of modernization; determining the impact on employees, customers, partners, and stakeholders; and creating program plans that will guide the projects. The first project will focus on transforming the unemployment insurance program in a phased approach, starting with unemployment insurance tax followed by unemployment insurance benefits.

Although some service/customer data resides in separate systems, Oregon continues to improve the interoperability of systems between systems and agencies. Data–sharing agreements, confidentiality issues, and program–specific requirements continue to create challenges in aligning and integrating data systems. In some cases, Oregon has developed innovative processes, and we continue to explore options at both the functional and administrative levels. For the Title I Adult and Dislocated Worker programs, the Employment Services and labor exchange functions, and Trade Act, customer data is passed between multiple systems, and staff have access to view customer data from any of the programs in which a customer is enrolled.

At this point in time, the state's core programs will utilize an aggregate data system to achieve interoperability for common data. The core programs will provide data to the state level data system, PRISM. Title II will collect programmatic data in TOPs Pro and convert that individual data into the CCWD data management system, D4A. Data in D4A will then be merged with PRISM. The data available in PRISM will be aggregate and not utilized for program improvement purposes. CCWD will monitor data submitted by individual adult education and literacy providers as it is transmitted in TOPs Pro for programmatic performance and continuous improvement purposes.

The user interface layer of this shared system is the WorkSource Oregon Management Information System (WOMIS), a multi–application customer and staff–accessed system that comprises Customer Registration, Program Eligibility Determination, iMatchSkills (labor exchange), Trade Adjustment Assistance, some WIOA service tracking, and other customer services and resources.

Enhancing WOMIS requires ongoing analysis and research, extensive information technology programming and coding, statewide hardware and software changes, and continuing fine-tuning, enhancements, and troubleshooting.

All local areas use a single MIS statewide (I-Trac) for tracking and reporting services provided through the Adult, Dislocated Worker and Youth programs. Customer demographic and service data is consolidated and checked for errors at the state level before being reported to DOL. At the state level, MIS elements are being reported uniformly, via this web-based platform with expanded data management capabilities making it possible for us to track and report program participant information on any number of federal, state, and local grants and funding streams. These enhancements have allowed data management collection and reporting services for every local workforce board in the state.

The Office of Workforce Investments encourages all local areas to deploy a customer record tracking and retention process that is efficient and effective for staff and customers, supports a data and file structure that is consistent statewide, and honors the federal Paperwork Reduction Act and state paperless initiatives, while meeting federal performance requirements.

In 2017, the Oregon Employment Department (OED) begin receiving a daily file transfer from the state's Department of Human Services (DHS) Self-Sufficiency management information system to identify customers eligible for SNAP Employment and Training (SNAP E&T) services. This file transfer has been instrumental in allowing staff to track, identify and case manage SNAP E&T participants. It has also improved program reporting and analysis. In 2020, DHS will implement its Integrated Eligibility Determination Project which will further streamline and improve the timeliness of SNAP data transferred to OED.

In 2020, OED begin receiving a file transfer of apprenticeship data from the state's Bureau of Labor and Industries, which oversees the state's Apprenticeship program. By mid-2020, this data should be available through the department's data warehouse where it can be cross referenced with other federal program data for improved program reporting and analysis.

### ii. 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

At the core of Oregon's integrated service delivery model is the WorkSource Oregon Management Information System (WOMIS). This system includes Customer Registration, the state's common registration module for customer intake and program eligibility determination; iMatchSkills, the state's labor-exchange system for job matching and referral and services tracking under Wagner-Peyser; I-Trac, the management information system for Adult, Dislocated Worker and Youth programs; and the Trade Act Management Information System. These systems are sufficiently connected to allow WorkSource Oregon staff to track participation across programs and for calculating a common exit date across Titles I and III and Trade Act. Titles II and IV track data in outside of the WOMIS environment; therefore, the state is not able to include these titles in its common exit policy. At this time, updating WOMIS to track program participation across all core programs would be a complex and costly undertaking.

That said, the state has taken incremental steps to integrate data sharing and tracking of customer activity across programs. Examples include a 2017 data sharing agreement between the Oregon Employment Department and the state's Department of Human Services Self-Sufficiency program to identify SNAP recipients in the state's labor-exchange system; and a 2019 update to the state's labor exchange system to identify Trade Act affected workers and those currently enrolled in training. The state will continue to explore these types of data sharing agreements and system enhancements to further streamline and improve service delivery and program reporting.

To assess participants' post–program success, Oregon will be using the federal measures prescribed in WIOA. Available data supports the evaluation of programs at the state and local levels. The service delivery model and economic conditions will be assessed annually against the outcomes achieved during the prior year. Options for continuous improvement will be discussed at the state and local levels, and performance targets will be adjusted accordingly.

Title II will track participants who have exited into employment and post-secondary education. A wage record match will be conducted to determine employment of adult education and literacy participant's following program exit. The wage record match occurs through an agreement with the Employment

Department and requires the use of participant social security numbers. Participants will be tracked into postsecondary education, through CCWD's student database, D4A, using the student's social security number and universal student identification number.

iii. 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

The WTDB has established a number of priorities including:

- Promoting accountability among public workforce partners;
- Identifying barriers, providing solutions, and avoiding duplication of services;
- Increase understanding and utilization of the workforce development system; and
- Coordinate and streamline the workforce system so job seekers and employers find what they need more efficiently

These and other priorities are customer-centric working toward a workforce development system that is well known, easy to access, and accountable for results. The state board will assist the Governor by continuing to focus on system results and the needs or impediments to both measuring and improving the results for individuals and employers. Alignment of technology and data systems across the partner programs and agencies are the key to creating such a system and accountability mechanisms.

# iv. Describe the State's plans to develop and produce the reports required under section 116, performance accountability system. (WIOA section 116(d)(2))

For Title I, all local areas use a single MIS statewide (I-Trac). Customer demographic and service data is consolidated and checked for errors at the state level before being reported to DOL. At the state level, MIS elements are being reported uniformly, via this web-based platform with expanded data management capabilities making it possible for us to track and report program participant information on any number of federal, state, and local grants and funding streams. These enhancements have allowed data management collection and reporting services for every local workforce board in the state.

For Wagner-Peyser (Title III), WSO uses the WorkSource Oregon Management Information System applications of Customer Registration and iMatchSkills to track program participation and labor-exchange activity. Data tracked in these systems is combined with data from other source systems including UI wage record data and to generate the Participant Individual Record Layout (PIRL) reports.

For Trade Adjustment Assistance (TAA), WSO uses the Trade Adjustment Assistance Management Information System (TAAMIS) to track program participation. Data tracked in TAAMIS is combined with data from multiple source systems to include the state's labor-exchange system, I-Trac and UI wage records to generate the PIRL reports. The state is currently undertaking a project to enhance the PIRL reporting data sources for the quarterly TAA federal reports. The state is currently working to implement data validation guidelines as outlined in TEGL 7-18 to ensure program data are consistent and accurately reflect the performance of each core program in the state.

## B. 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.

Oregon will be using the federal measures prescribed in WIOA. Available data supports the evaluation of programs at the state and local levels. The service delivery model and economic conditions will be assessed annually against the outcomes achieved during the prior year. Options for continuous improvement will be discussed at the state and local levels, and performance targets will be adjusted accordingly.

Oregon is researching the use of additional indicators to monitor service delivery in real-time, improve outcomes, and respond to immediate needs of our local communities. Once any additional measures are developed, tested, and approved, the measures will be applied and used to monitor activities on a timely basis. The goal is to support the real-time adjustment of resources and service delivery to match local demand.

Title II will track participants who have exited into employment and postsecondary education. A wage record match will be conducted to determine employment of adult education and literacy participant's following program exit. The wage record match occurs through an agreement with the Employment Department and requires the use of participant social security numbers. Participants will be tracked into postsecondary education, through CCWD's student database, D4A, using the student's social security number and universal student identification number.

Title IV, VR and OCB receive UI wage data through a contract with the Employment Department. VR/OCB will check clients' employment status as per WIOA Performance Measure for retention at the 2<sup>nd</sup> and 4<sup>th</sup> quarter after the client exits VR services. VR has an agreement with CCWD's student database to match of VR clients who have exited the program utilizing the client's social security number which will be used to assess the client's progress in completing credentials and obtaining skill after their exit from the VR Program.

## C. 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.)

Oregon currently has the statutory authority in place to share Unemployment Insurance (UI) Wage Record Data to partners under the Workforce Investment Act of 1998 for the purpose of administering state workforce programs under the Act. Oregon updated its statutory authority in 2017 to authorize disclosure of UI Wage Record Data to partners under the Workforce Innovation and Opportunity Act of 2014, including Oregon's public universities and the Oregon Health and Science University. Since 2017, the Employment Department developed information and data sharing agreements to share UI wage record data with a number of core partners permissible under state and federal law and will continue to develop new agreements in 2020 and beyond.

Oregon currently uses UI wage record data to support federal performance measures. The necessary information sharing agreements are in place. Once federal reporting requirements and record layout are finalized, state and local partners will perform an analysis to determine next steps to effectively

and efficiently meet the reporting requirements. Unemployment insurance wage record match will be conducted to determine employment of adult education and literacy participants following program exit. The wage record match occurs through an agreement with the Employment Department and requires the use of participant social security numbers.

## D. 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.

All information collected under the programs administered by the HECC Office of Workforce Investments and Office of Community Colleges and Workforce Development, the Oregon Employment Department, and Vocational Rehabilitation is considered confidential. This includes programs under Titles I, II, III and IV, as well as other required one stop partner programs. State law, rule and policy provide security controls to govern processes, procedures, data systems, information release, and audits. These controls are designed to make sure all confidential information is protected from the time the information is received to the time it is destroyed. Employees and partners are also trained on the appropriate use and security of confidential information, and the penalties for its misuse.

## 7. 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.

#### Priority of Service to Covered Persons (Veterans and Eligible Spouses):

USDOL implemented priority of service for veterans and eligible spouses, as required under the Jobs for Veterans Act (JVA) since November 7, 2002. JVA calls for priority of service to be implemented by all "qualified job training programs," defined as "any workforce preparation, development or delivery program or service directly funded, in whole or in part, by the Department of Labor." Since enactment of JVA, priority of service has been implemented under policy guidance issued by the Employment and Training Administration (ETA). The purpose of these regulations is to further articulate how priority of service is to be applied across all new and existing qualified job training programs. The Training and Employment Guidance Letter (TEGL) No. 10-09 dated November 10, 2009, provides additional guidance.

In accordance with 20 CFR Part 1010, "Priority of Service for Covered Persons, Final Rule," veterans and eligible spouses are referred to as "Covered Persons." WorkSource Centers will ensure the priority of service of veterans and eligible spouses for the receipt of employment, training, and placement services provided under WIOA. Covered Persons must still meet each program's eligibility criteria to receive services under the respective employment and training program. Additionally, the Oregon Workforce and Talent Development Board has posted a policy addressing Priority of Service requirements.

**Key Definitions:** 

- *Covered Person* the regulations adopt and apply this statutory term, which includes veterans and eligible spouses.
- Veteran the regulations specify that the definition for veteran specified at 38 U.S.C. 101(2) applies across all qualified job training programs for the purpose of priority of service. The definition includes two key criteria:
  - o Service in the active military, naval, or air service
  - Discharge under conditions other than dishonorable
- *Eligible Spouse* means a spouse of any of the following:
  - o A spouse of any veteran who died of a service- connected disability;
  - A spouse of any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days;
    - Missing in action;
    - Captured in the line of duty by a hostile force; or
    - Forcibly detained or interned in the line of duty by a foreign government or power.
  - A spouse of any veteran who has a total disability resulting from a service- connected disability, as evaluated by the Department of Veterans Affairs; or
  - $\circ$   $\,$  A spouse of any veteran who died while a disability was in existence.

#### Implementation:

Local Workforce Development Boards (LWDBs) will ensure their local plan provides clear strategies and policies for providing Covered Persons with the highest quality of service at every phase of services offered. Policies shall be implemented to ensure eligible veterans and eligible spouses are aware of:

- Their entitlement to priority of service
- The full array of programs and services available to them
- Any applicable eligibility requirements for those programs and/or services

Priority of Service to Covered Persons means when customers self-attest they are a veteran or an eligible spouse, they are given precedence over eligible non-covered persons for the receipt of employment, training and placement services provided under new or existing qualified job training programs. Veterans or eligible spouses shall receive access to the service or resources before non-covered persons. If the service or resource is limited, the veteran or Covered Person receives access to the service or resource instead of or before the non-covered person. For example, this could mean:

- The Covered Person receives access to the service or resource earlier in time than the noncovered person; or
- If the service or resource is limited, the Covered Person receives access to the service or resource before the non-covered person.

#### Other examples of Priority of Services for Covered Persons include the following:

- Referral of qualified veterans and eligible spouses to new job openings, especially federal contractor job orders, prior to all non-veteran job referral activity
- Job fairs for veterans and all-inclusive job fairs giving priority to veterans

It is the responsibility of the State Workforce Centers to ensure that Covered Persons are made aware of and given priority of service. Jointly staffing the four services (Exploratory, Career, Training, and Business) is Oregon's method to avoid duplication and ensure coordination of all programs within the WorkSource Centers. Priority of Service for Covered Persons information is available on the Oregon Employment Department website, and is included in the Oregon Employment Department offices phone greetings.

WorkSource Centers will follow their office plan related to implementing Priority of Service to Covered Persons. At a minimum:

- Identify Covered Persons who must receive priority of service at point of entry
- Inform Covered Persons of their entitlement to priority of service
- Identify Covered Persons with Significant Barriers to Employment (SBE) as this population is served by Disabled Veterans' Outreach Program (DVOP) Specialist.
- Inform appropriate WorkSource staff, following local office procedures, that a Covered Person is in need of services. This includes making referrals to DVOP specialist.

To ensure that eligible veterans and eligible spouses become aware of Priority of Service for Covered Persons, the following methods will be used to emphasize our commitment:

- 1. Signage: Ensure proper signage is clear for everyone to see, especially upon entering each WSO office, to inform our customers that Priority of Service for Covered Persons is offered to eligible veterans and eligible spouses. Priority of Service Poster ES PUB 259.
- 2. Contact (in-person/phone): WorkSource staff should always ask "Have you ever served in the U.S. military, or, are you the spouse of a veteran?" WorkSource Centers main phone greeting has the message "We provide Priority of Service to U.S. Military Veterans and Eligible Spouses seeking employment. Please let us know if this applies to you."
- Informed: Covered Persons need to be informed of all programs funded in part or in full by the U.S. Department of Labor (e.g. Job Placement priority, Training Funds, Senior Community Service Employment Program, and other programs).
- 4. Services: WorkSource Center staff will assist each Covered Person with employment services, information about training opportunities, and community resources. If the Covered Person qualifies for DVOP services, WSO staff can schedule an appointment date/time for the customer to meet with the DVOP. If the Covered Person prefers to wait to be seen by the DVOP, they can do so and take a chance that the DVOP schedule will have an appointment cancellation or a no show.
- 5. Workshops: Covered Persons will get priority/preference. This usually is not an issue but if there is a popular workshop, WSO staff should leave a couple of spots open, or be prepared to accommodate any Covered Persons that come in unexpectedly. When a workshop is full, the wait list will place the Covered Persons at the top of the wait list.

#### WorkSource Centers Roles:

WorkSource Center staff are the primary providers of employment and training services to Covered Persons. USDOL provides additional populations of veterans and eligible persons qualifying for DVOP services through Training and Employment Guidance Letters (e.g. TEGL 20-13 Change 2) and Veteran Programs Letters (VPL). While WSO staff are providing services to Covered Persons, and they identify a Significant Barrier to Employment (SBE) a referral to the DVOP specialist is appropriate practice.

- Resource Room: At the main entrance to the lobby area WorkSource Center staff greet customers while keeping "Priority of Service for Covered Persons" in-mind. Exploratory and Career Services are provided in the resource room area and in the interview cubicles. Each WorkSource Center follows their local office plan on how to identify and track Covered Persons (e.g. intake spreadsheet). An optional table tent can be used by the customer to indicate Veteran/Covered Persons. This allows our WSO staff and partners to easily recognize Covered Persons in the resource room for services as needed.
- Interview Cubicle: Customers are interviewed for job referrals, training programs, and community support services. During the conversation with a veteran or eligible spouse, if a Significant Barrier to Employment is identified that the WorkSource Center staff cannot resolve, a referral to the DVOP Specialist will be made.
- 2. Job Listing and Other Job Placement Activities: iMatchSkills® has a built-in function to sort veterans and eligible spouses to the top of the list for job notification consideration.
  - a. WorkSource Center Business Services staff actively performs match searches on enhanced job listings to locate qualified job seekers. The Business Services staff notifies qualified veterans and eligible spouses of job openings by sending e-mail notification, and also calling them as soon as possible. Business Services staff documents the "Veterans & Eligible Spouse file search completed" on enhanced job listings tracking notes. Most job listings are in self-referral status that can't be actively searched by WorkSource Center staff.
  - b. WorkSource Center's Business Services staff should notify DVOP Specialist of any "Immediate Need/Special" recruitments.
  - c. WorkSource Center's Business Services staff will assist the Local Veterans' Employment Representative in placing Covered Persons into employment.
- Business Services/Employer Relations: WorkSource Center's Business Services staff, and Local Veterans' Employment Representative (LVER) will be responsible for promoting veterans as a viable candidate pool to local business, Oregon Employer Council, Workforce Boards, Chamber of Commerce Events, Society of Human Resources (SHRM), and other venues.
  - a. Items to promote include, but are not limited to: Work Opportunity Tax Credit (WOTC), One-on-One visit with LVER to discuss veterans' recruitment strategies, and other related programs.
  - b. Assist with setting up informational interviews for job ready veterans and eligible spouses with local businesses.
  - c. A tracking note on the business iMatchSkills® file will be made to document the promotion of veterans, informational interviews, or other special programs (e.g. WOTC, OJT, Job Fair).
- 4. Job Ready Case Managed Veterans and Eligible Spouses: The DVOP Specialist and WorkSource Center staff will connect job ready veterans and eligible spouses with the WSO Business Services staff. WSO Business Services staff can interview the veteran or eligible spouse to understand their employment goals to potentially create a job development opportunity. WSO Business Services staff will provide the DVOP and other case managers with feedback on the job ready customer's interview. The job ready customer is still under the case management for follow up services as needed until employed.
  - a. WorkSource Center staff will assist with placement services of job ready veteran and eligible spouse being case managed by DVOP Specialist.

#### Monitoring of Priority of Service:

The demonstration of Priority of Service is the responsibility of WorkSource Centers. It is also the responsibility of the Oregon Workforce Partnership and LWDB leadership to ensure that Priority of Service for Covered Persons is successfully implemented statewide. The JVSG staff (LVER, DVOP, CONS), State Veterans Programs Coordinator, Oregon Employment Department Training Team, and USDOL-VETS provide technical assistance when requested or needed.

Monitoring activities generally include on-site visits, interviews with staff, and regular reviews of local office plans, and if available LWDB policies related specifically to "Priority of Service for Covered Persons." USDOL will also conduct visits and federal audits, as scheduled. The JVSG staff submit Quarterly Managers Reports to the local office managers that identify Priority of Service for Covered Persons, and will identify issues and resolutions to Priority of Service as they arise.

#### Programs include but are not limited to:

- WIOA Adult
- WIOA Dislocated Worker
- National Dislocated Worker Grants (NDWG)
- Wagner-Peyser State Grants
- Trade Adjustment Assistance (TAA)
- Senior Community Service Employment Program

#### Additional programs include:

- WIOA Youth Program
- Community-Based Job Funding Grants
- Migrant and Seasonal Farm Worker Program (MSFW)
- Indian and Native American Program
- H-1B Technical Skills Training Grants
- Office of Disability Employment Programs
- Labor Market Information Formula Grants
- Pilots and Demonstration Grants
- Research and Development
- Other internet-based tools operated by USDOL grantees

WorkSource Centers with JVSG Staff have "Local Office Plan of Service to Veterans and Covered Persons" that are reviewed by Managers and JVSG staff each year. WorkSource Centers without JVSG staff will have similar plans for "Priority of Service for Covered Persons" and will be monitored by Managers and LWDBs. All WorkSource Centers must have local office plans in place that outline how each office will provide priority of service and refer eligible veterans and spouses with SBE to DVOP Specialist for Individualized Career Services. The LVERs, State Veterans Programs Coordinator, and USDOL-VETS will provided technical assistance as requested.

#### Training on Priority of Service for Covered Persons:

The Oregon Employment Department Training Unit provides training for staff in WorkSource Centers to ensure new and existing staff have the knowledge and resources to professionally serve Covered Persons. Understanding Priority of Service for Covered Persons, policy and procedures, how to serve Covered Persons, and when to refer Covered Persons to DVOP is key for successful implementation. Department of Labor approved Priority of Service for Covered Persons training for WorkSource Center staff is available online via iLearnOregon and through Workforcegps.org web site. iLearn Oregon is Oregon's interactive training site for all WSO staff. In addition, information on priority of service is also available on the Oregon Employment Department website for the public.

LWDBs, Management, OED Training Unit, Disabled Veterans' Outreach Program Specialists (DVOP), Consolidated Positions (CONS), and Local Veterans' Employment Representative (LVER) are responsible to ensure ongoing training to WSO staff and partners in local offices happens.

#### Covered Persons with Significant Barrier to Employment (SBE) Referral to DVOP Specialist:

Oregon has a limited number of Disabled Veterans' Outreach Program (DVOP) Specialist statewide. DVOP Specialists provide Individual Career Services (intensive services) within a case management framework to veterans and eligible spouses with identified SBE(s). WorkSource Center staff focus on providing services and initial assessment to Covered Persons seeking employment and training assistance (majority of Covered Persons will be served by WorkSource Center staff).

If the Covered Person self discloses through customer registration or during interaction with WorkSource Center staff that they have a SBE that qualifies them for DVOP services, WorkSource Center staff will promote the specialized DVOP services and facilitate a warm hand off in person, or a referral via phone or email to DVOP staff, or another acceptable process. When DVOP staff is not available, WorkSource Center staff provide services, and/or arrange for services to be provided.

When Covered Persons with SBE are referred to DVOP Specialists, WSO staff will use the iMatchSkills® (or newer MIS) to record the job seeker service "Referral to DVOP for Veteran's Services" and document the identified SBE(s) in a tracking note, prior to referral to DVOP.

The DVOP Specialist will at a minimum complete an in-depth interview and evaluation and create a plan of action. DVOPs will proceed as appropriate for each individual job seeker, which could include creation of an Individualized Employment Plan (IEP) for case management.

## 8. 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.

Local–level Equal Opportunity Officers are required to monitor facilities for compliance on a yearly basis. The state Universal Access Coordinator (UAC) completes a site visit to area WSO locations on a rotating basis to ensure compliance with ADA accessibility. The state UAC's oversight Monitoring Review Guide includes specific monitoring review guidelines to ensure that all plans and contracts contain the required assurance language.

Current Oregon practices designed to broaden the composition of those considered for participation and employment at the WSO centers include but are not limited to the following:

- Designated bilingual positions postings
- Recruitment of applicants with bilingual skills and experience
- Identification and testing of staff with bilingual skills
- Information exchange and collaboration with community organizations regarding translators, interpreters and resources for those with Limited English Proficiency
- Publication of selected materials in languages other than English
- Use of telephone interpreters and contract interpreters as needed to provide language assistance to customers on a case-by-case basis
- Disability awareness and cultural sensitivity training for staff
- · Accessibility to auxiliary aids and assistive devices and trained staff in all WIOA regions
- Participation in local and statewide job related events including job fairs, school career days, media feature stories, seminars and networking groups. State recipient agencies and local workforce staff will conduct programmatic and architectural accessibility compliance site reviews for their own and sub-recipient sites at least every two years and training for recipient and sub-recipient staff on an on-going basis.

OED's Language Assistance Policy, COM 2, clarifies the standards for making WSO services accessible and delivering services to customers that are English Language Learner (ELL), consistent with federal and state law and well–established ELL principles. This policy is used by all WorkSource Oregon staff.

In addition, the WSO system follows the federal Department of Justice's Vital Documents Questions and Answer guidelines. The state Universal Access Coordinator (UAC) works with local EOOs and workforce boards to develop a plan of improvement if a workforce region is not meeting the standards for equal access.

The state UAC will determine the need for language assistance by utilizing the Four–Factor Analysis. The number or proportion of ELL individuals eligible to participate or likely to be directly or significantly affected by the program or activity; the frequency of contact a participant or beneficiary is required to have with the program or activity; the nature and importance of the program or activity to the participant or beneficiary; the resources available to the recipient in carrying out the program or activity.

A variety of on-line courses on diversity are available to all staff, as well as a lending library with a number of titles on diversity and inclusion, and Equal Opportunity. In addition, the EOOs and the state UAC work together to provide training and support for staff of the WSO centers. They also provide ELL and cultural competency training. OED staff is trained annually on telephone interpretation service and the language assistance policy. Trainings may happen in person, through webinars, e-learning or publications.

The Governor's office and Workforce Development Boards in Oregon are focusing on improving employment outcomes for populations that are traditionally under or unemployed, such as the ELL and Persons with Disabilities (PWD) populations. The state UAC, through coordination with local EOOs and WSO service providers, will ensure that recipients take reasonable steps to include members of various demographic groups in their programs or activities. The state UAC provides an ongoing assessment of target populations receiving WSO services in comparison to census data. This assessment is evaluated by all workforce regions and an analysis of compliance is completed. The review for universal access examines plans for targeting and outreach to identify target populations. Recipients are expected to engage in specific outreach efforts targeted to members of

various demographic groups by using a variety of media outlets and methods to ensure they provide universal access to services and to employment opportunities. Local workforce area providers and are monitored on universal access as part of the annual self–assessment. The assessments are evaluated and analyzed by all regions and reported to the state UAC, who then, reviews the analysis and makes any final comments or observations. Areas not meeting compliance will be asked to develop a corrective action plan. Population changes including language and special needs are viewed on a continual basis.

The UAC also implements and monitors the agency's Language Assistance Policy. The agency utilizes the four–factor analysis as noted in Federal Register, 66, No. 11, to determine required populations for language assistance. OED conducts outreach activities in those OED offices that meet the Essential Language and Significant English Language Learners population thresholds. All OED offices that meet an essential language threshold will submit to their assistant director, regional manager, or administrator an annual outreach plan for identified ELL populations. The Americans with Disabilities Act Checklist for Readily Achievable Barrier Removal is utilized as a field evaluation. WSO centers are required to do a self–assessment as part of the Annual Compliance Review.

Although the Disability Navigator Program (DNP) funding has ended, the WSO system has recently instituted Universal Access Navigators, who have taken this role in addition to their regular duties. These benefits include:

- Provision of information for WSO staff regarding service delivery for customers who
  experience a disability or people who have encountered multiple barriers to employment.
  Navigators provided specialized assistance and guidance to available resources to help the
  WSO center staff better meet the needs of job seekers with disabilities or language as well as
  other barriers to employment. An example of this might be training and advising staff on how
  to meet the needs of a customer who is deaf or providing guidance on jobsite
  accommodations. Navigators also provided information on resources for services that went
  beyond the ability of the center.
- Provision of information that WSO staff can use to assist job seekers to get information about available programs and services that might impact their search for employment and to assist the job seeker in breaking down barriers to employment through access to resources such as Career and Resource Mapping Workshops, resource coordination and assistance in negotiating Integrated Resource Teams.
- Provision of information on assistive technology and accommodation that WSO staff can use are available to assist employers who will be employing individuals with disabilities. WSO staff also learned how to give employers information about an underutilized labor pool, tax savings information, and conduct outreach to agencies/organizations that serve people with disabilities.

In each WSO center, staff is trained in disability etiquette and how to ensure customers receive requested accommodations. The on-site compliance review will combine a review of summary materials as completed in a desk audit compliance review with an architectural accessibility review of the recipient's facilities, operations and procedures. Physical review of each facility may be done in collaboration with HECC and other state agencies.

In Gresham and Eugene, WSO Offices have installed a Video Relay System (VRS) for assuring equitable access to the Deaf and Hard of Hearing (D&HH) community. VRS works in the same way as the 711 Relay services and is funded by the Federal Communications Commission (FCC). The difference is that with VRS, a D&HH customer may use Sign Language to communicate with a relay operator who then transmits the information to the hearing receiver through a regular phone. There is no need for a VRS, or video phone, on the receiving end. The VRS in these two offices serves as a pilot project and is in compliance with ADA regulations in terms of assuring that customers have equitable access to our services. If the pilot proves successful, more offices will receive the VRS devices. Many D&HH individuals already have VRS in their homes. The VRS in our offices will be treated as a means for this community to contact UI as well as for employment purposes. Should a UI

claims taker or other UI staff receive a call via the VRS, they will be told that a VRS operator is on the other end before the customer's message is relayed, just like if they were receiving a 711 call.

Oregon's One-Stop center certification policy is currently under revision and development. The certification criteria comprise, in part, definitions for each type of physical location/office, including all of the services that must be present or accessible, and the requirement that all Comprehensive One-stop centers, affiliated one-stop centers, specialized centers, and partner sites must be physically and programmatically accessible to individuals with disabilities.

#### Individuals with Limited Language Proficiency:

Participation in Expanding Opportunities technical assistance project to learn more about promising practices and receive technical assistance regarding the implementation of Integrated English Literacy and Civics Education.

The Oregon Employment Department has updated their Language Assistance policy and procedures. While still in review, once finalized it will include clearer directives for managers and staff, including hiring and the use of bilingual staff, telephonic and video interpretation, and translation of vital documents.

#### Individuals with Disabilities - Universal Access:

To better serve customers with limited English proficiency, or customers who may require ASL interpretation, the Oregon Employment Department finalized a contract for video interpretation services. Five American Job Centers currently use this service, with additional centers projected to come online in PY 2020. This new tool has significantly improved the agency's ability to communicate with and share information with customers.

The Oregon Employment Department has also integrated the Universal Access Navigator concept to their offices. These staff member, in addition to their regular duties, also provide additional support to customers with disabilities and limited English proficiency. This is based on the 2010 DOL Disability Navigator grant.

#### Partnerships:

Increased state-level collaboration with Oregon's WIOA title IV partners is helping to ensure that services to individuals who are visually impaired and individuals seeking vocational rehabilitation are accessible through a variety of formats, in locations across the state.

The Oregon Commission for the Blind is now a partner in the WorkSource Oregon Centers and working with WIOA core partner service delivery staff to increase the delivery and uptake of services to the Blind and Low Vision community. OCB has provided training on disability awareness, disability etiquette and assistive & adaptive device technology as they pertain to Oregonians experiencing vision loss to OED Universal Access Navigator staff located in WSO Centers. OCB plans on repeating this training annually.

An additional partnership with the Oregon Youth Authority (OYA) is in the early stages of development.

## 9. Addressing the Accessibility of the One-Stop Delivery System for Individuals who are English Language Learners

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.

Addressing the Accessibility of the WSO Delivery System` Local–level Equal Opportunity Officers are required to monitor facilities for compliance at least every two years. The state Universal Access Coordinator (UAC) completes a site visit to area WSO locations on a rotating basis to ensure compliance with ADA accessibility. The state UAC's oversight Monitoring Review Guide includes specific monitoring review guidelines to ensure that all plans and contracts contain the required assurance language. Current Oregon practices designed to broaden the composition of those considered for participation and employment at the WSO centers include but are not limited to the following:

- Designated bilingual positions postings
- Recruitment of applicants with bilingual skills and experience
- Identification and testing of staff with bilingual skills
- Information exchange and collaboration with community organizations regarding translators, interpreters and resources for those with Limited English Proficiency
- Publication of selected materials in languages other than English
- Use of telephone interpreters and contract interpreters as needed to provide language assistance to customers on a case-by-case basis
- Disability awareness and cultural sensitivity training for staff
- Accessibility to auxiliary aids and assistive devices and trained staff in all WIOA regions
- Participation in local and statewide job related events including job fairs, school career days, media feature stories, seminars and networking groups.

State recipient agencies and local workforce staff will conduct programmatic and architectural accessibility compliance site reviews for their own and sub-recipient sites at least every two years and training for recipient and sub-recipient staff on an on-going basis. OED's Language Assistance Policy, COM 2, clarifies the standards for making WSO services accessible and delivering services to customers that are English Language Learner (ELL), consistent with federal and state law and well-established ELL principles. This policy is used by all WorkSource Oregon staff.

In addition, the WSO system follows the federal Department of Justice's Vital Documents Questions and Answer guidelines. The state Universal Access Coordinator (UAC) works with local EOOs and workforce boards to develop a plan of improvement if a workforce region is not meeting the standards for equal access.

The state UAC will determine the need for language assistance by utilizing the Four–Factor Analysis. The number or proportion of ELL individuals eligible to participate or likely to be directly or significantly affected by the program or activity; the frequency of contact a participant or beneficiary is required to have with the program or activity; the nature and importance of the program or activity to the participant or beneficiary; and the resources available to the recipient in carrying out the program or activity.

A variety of on-line courses on diversity are available to all staff, as well as a lending library with a number of titles on diversity and inclusion, and Equal Opportunity. In addition, the EOOs and the state UAC work together to provide training and support for staff of the WSO centers. They also provide ELL and cultural competency training. OED staff is trained annually on telephone interpretation service and the language assistance policy. Trainings may happen in person, through webinars, e-learning or publications.

The Governor's office and Workforce Development Boards in Oregon are focusing on improving employment outcomes for populations that are traditionally under or unemployed, such as the ELL and Persons with Disabilities (PWD) populations. The state UAC, through coordination with local EOOs and WSO service providers, will ensure that recipients take reasonable steps to include members of various demographic groups in their programs or activities. The state UAC provides an ongoing assessment of target populations receiving WSO services in comparison to census data. This assessment is evaluated by all workforce regions and an analysis of compliance is completed. The review for universal access examines plans for targeting and outreach to identify target populations. Recipients are expected to engage in specific outreach efforts targeted to members of various demographic groups by using a variety of media outlets and methods to ensure they provide universal access to services and to employment opportunities. Local workforce area providers and are monitored on universal access as part of the annual self-assessment. The assessments are evaluated and analyzed by all regions and reported to the state UAC, who then, along with the Universal Access Workgroup, reviews the analysis and makes any final comments or observations. Areas not meeting compliance will be asked to develop a corrective action plan. Population changes including language and special needs are viewed on a continual basis.

The UAC also implements and monitors the agency's Language Assistance Policy. The agency utilizes the four–factor analysis as noted in Federal Register, 66, No. 11, to determine required populations for language assistance. OED conducts outreach activities in those OED offices that meet the Essential Language and Significant English Language Learners population thresholds. All OED offices that meet an essential language threshold will submit to their assistant director, regional manager, or administrator an annual outreach plan for identified ELL populations. The Americans with Disabilities Act Checklist for Readily Achievable Barrier Removal is utilized as a field evaluation. WSO centers are required to do a self-assessment as part of the Annual Compliance Review.

Although the Disability Navigator Program (DNP) funding has ended, the WSO system continues to benefit from the legacy of experience and assistance provided by the navigators. These benefits include:

- Provision of information for WSO staff regarding service delivery for customers who
  experience a disability or people who have encountered multiple barriers to employment.
  Navigators provided specialized assistance and guidance to available resources to help the
  WSO center staff better meet the needs of job seekers with disabilities and others
  experiencing barriers to employment. An example of this might be training and advising staff
  on how to meet the needs of a customer who is deaf or providing guidance on jobsite
  accommodations. Navigators also provided information on resources for services that went
  beyond the ability of the center.
- Provision of information that WSO staff can use to assist job seekers to get information about available programs and services that might impact their search for employment and to assist the job seeker in breaking down barriers to employment through access to resources such as Career and Resource Mapping Workshops, resource coordination and assistance in negotiating Integrated Resource Teams.
- Provision of information on assistive technology and accommodation that WSO staff can use are available to assist employers who will be employing individuals with disabilities. WSO staff also learned how to give employers information about an underutilized labor pool, tax savings information, and conduct outreach to agencies/organizations that serve people with disabilities. In each WSO center, staff is trained in disability etiquette and how to ensure customers receive requested accommodations. The on–site compliance review will combine a

review of summary materials as completed in a desk audit compliance review with an architectural accessibility review of the recipient's facilities, operations and procedures. Physical review of each facility may be done in collaboration with OWI, OED, and other state agencies. In Gresham and Eugene, WSO Offices have installed a Video Relay System (VRS) for assuring equitable access to the Deaf and Hard of Hearing (D&HH) community. VRS works in the same way as the 711 Relay services and is funded by the Federal Communications Commission (FCC). The difference is that with VRS, a D&HH customer may use Sign Language to communicate with a relay operator who then transmits the information to the hearing receiver through a regular phone. There is no need for a VRS, or video phone, on the receiving end. The VRS in these two offices serves as a pilot project and is in compliance with ADA regulations in terms of assuring that customers have equitable access to our services. If the pilot proves successful, more offices will receive the VRS devices. Many D&HH individuals already have VRS in their homes. The VRS in our offices will be treated as a means for this community to contact UI as well as for employment purposes. Should a UI claims taker or other UI staff receive a call via the VRS, they will be told that a VRS operator is on the other end before the customer's message is relayed, just like if they were receiving a 711 call.

## 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.

A state planning workgroup comprised of program leads and executive management from the Oregon Workforce and Talent Development Board, Research and Data, Title I (Adult, Dislocated Worker and Youth programs), Title II (Adult Basic Education and Literacy Programs), Title III (Wagner–Peyser Employment Services, Title IV (Vocational Rehabilitation and Commission for the Blind), and SNAP and TANF (DHS Self–Sufficiency), SCSEP (DHS Seniors & People with Disabilities), and the U.S. Department of Housing and Urban Development. Members of this group worked collaboratively in true partnership in planning and coordinating amongst WIOA required core programs and WorkSource Oregon partners in the design, development and completion of the Oregon Combined State Plan. This workgroup included staff from the Higher Education Coordinating Commission (Office of Workforce Investments and Community Colleges and Workforce Development), the Oregon Employment Department (including the departments of Business Services, Migrant and Seasonal Farmworkers, Unemployment Insurance, Veterans Services, Workforce and Employment Research Division, and State Universal Access), Vocational Rehabilitation, Commission for the Blind, DHS Self Sufficiency and Seniors & People with Disabilities, and U.S. Department of Housing and Urban Development.

# V. Common Assurances (For All Core Programs)

The Unified or Combined State Plan must include assurances that:

The State Plan must includeInclude1. The State has established a policy identifying circumstances that may present a conflict of<br/>interest for a State Board or local board member, or the entity or class of officials that the<br/>member represents, and procedures to resolve such conflicts;Yes

The State Plan must include	Includ
2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;	Yes
3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;	Yes
<ul> <li>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;</li> <li>(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;</li> </ul>	Yes
5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;	Yes
6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);	Yes
7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;	Yes
B. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;	Yes
9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs;	Yes
10. The State has a one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990 (ADA);	Yes
11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and	Yes
12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.	Yes

## VI. Program-Specific Requirements for Core Programs

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

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

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

## a. General Requirements

## 1. Regions and Local Workforce Development Areas

## A. Identify the regions and the local workforce development areas designated in the State

#### Local Workforce Development Areas:

For the implementation of the Workforce Innovation and Opportunity Act (WIOA), Governor Kate Brown designated nine Local Workforce Development Areas (local areas). The nine local areas are:

- 1. Multnomah and Washington counties and the City of Portland
- 2. Clackamas County
- 3. Linn, Marion, Polk and Yamhill counties
- 4. Benton, Clatsop, Columbia, Lincoln, and Tillamook counties
- 5. Lane County
- 6. Jackson and Josephine counties
- 7. Coos, Curry and Douglas counties
- 8. Crook, Deschutes, Gilliam, Hood River, Jefferson, Klamath, Lake, Sherman, Wasco, and Wheeler counties
- 9. Baker, Grant, Harney, Malheur, Morrow, Umatilla, Union, and Wallowa counties

Further, for purposes of identifying regions, as described and required in WIOA Sec. 106 (a), each of these local areas will be a region unto itself, as allowed in WIOA Sec. 106 (a)(2)(A).

B. Describe the process used for designating local areas, including procedures for determining whether the local area met the criteria for "performed successfully" and "sustained fiscal integrity" in accordance with 106(b)(2) and (3) of WIOA. Describe the process used for identifying regions and planning regions under section 106(a) of WIOA. This must include a description of how the State consulted with the local boards and chief elected officials in identifying the regions

#### Determining Local Areas – From WIA to WIOA:

Prior to the implementation of WIOA, local areas were designated under WIA Section 116(a)(4), Designation on Recommendation of State Board. As required in the Act, areas were designated upon

request of the Local Elected Officials. The requests were brought before the State Workforce Investment Board (then called OWIB, now the WTDB). The Board recommended the designation of areas to the Governor. Designation took place during the initial implementation of the WIA. In 2014, local elected officials recommended that the Governor consider new boundaries within two existing local areas comprising a 24 (non-contiguous) county local area and an adjacent three county local area.

In August 2013, Oregon's Governor Kitzhaber issued an Executive Order clarifying expectations that all Local Workforce Development Boards (LWDBs) would be expected to expand their roles to better support the development of local solutions to labor market challenges. Other Workforce Redesign efforts were occurring at the same time, and the Governor realized that these efforts, combined with the Executive Order, might require — or benefit from — organizational changes for some local areas.

In March 2014, the Governor issued a letter inviting LWDBs and chief local elected officials to consider realigning local workforce development area boundaries, to allow for greater alignment of workforce boards with local economic development and job creation strategies, better align with Regional Solutions Teams boundaries, and support local decision making.

The role of the OWIB at that time in designation included reviewing forwarded designation requests from the Governor, determining/evaluating whether there was compelling evidence that a designation would improve a variety of factors, providing opportunities for public comment throughout the process (see Section II.) and making final recommendations to the Governor.

For the implementation of the Workforce Innovation and Opportunity Act (WIOA), Governor Kate Brown designated nine Local Workforce Development Areas (local areas).

#### Initial Designation under WIOA:

Four local areas were designated as a Local Workforce Development Area (LWDA) for the purposes of the Workforce Investment Act of 1998 (WIA), and requested initial designation as described in WIOA Section 106(b)(2).

Additionally, these local areas performed successfully and sustained fiscal integrity for the two years preceding the enactment of WIOA, as defined in WIOA Section 106(e), and were approved to continue to be a local area for the purposes of WIOA, through June 30, 2017 (PYs 2015 & 2016). "Successful performance" is determined by reviewing the local area's performance in relation to established federal, program-specific performance indicators/targets; fiscal integrity is tested through onsite monitoring of local fiscal policies and procedures and the review of annual third-party audit reports relating to the local board's fiscal activities.

The four local areas receiving approval for initial designation were:

- Multnomah and Washington counties and the City of Portland
- Clackamas County
- Lane County
- Jackson and Josephine counties

#### Designation on Recommendation of the State Board under WIOA:

In 2014, local elected officials recommended that the Governor consider new boundaries within two existing local areas comprising a 24 (non-contiguous) county local area and an adjacent three county local area.

The Oregon Department of Community Colleges and Workforce Development, the Governor, and the Oregon Workforce Investment Board (OWIB) collaborated to develop a voluntary, locally initiated

procedure for LWA Designation Requests, based on guidance found in the Workforce Investment Act, Final Rule, TEGL 37-10 Workforce Investment Act (WIA) and Appropriations Act Provisions on the Designation of Local Workforce Development areas, and contact with DOL/ETA Region 6 staff.

On October 22, 2014, the Governor designated five new local workforce areas. The designation process conformed to Section 116 of the WIA and TEGL 37-10, and aligns with Section 106(b)(4) of the Workforce Innovation and Opportunity Act. This entire process, including the State Board review criteria, public comments, and the Governor's approval letter, became part of Oregon's State Plan via WorkSource Oregon State Plan Modification 01-14, and Oregon received official approval of the modification and designations from the Department of Labor on January 20, 2015.

The five local areas so designated are:

- Linn, Marion, Polk, and Yamhill counties
- Benton, Clatsop, Columbia, Lincoln, and Tillamook counties
- Coos, Curry, and Douglas counties
- Crook, Deschutes, Gilliam, Hood River, Jefferson, Klamath, Lake, Sherman, Wasco, and Wheeler counties
- Baker, Grant, Harney, Malheur, Morrow, Umatilla, Union, and Wallowa counties

Oregon believes that the designation process aligns with the intent of the Workforce Innovation and Opportunity Act. It provides additional flexibility to local boards and allows them to focus on local economic issues, while potentially strengthening their strategic roles locally and across the state. This should allow these new, smaller local boards to better serve the specific need(s) of their community(ies) while ultimately fostering regional collaboration.

For additional information and details, please see related documents on the WTDB website.

## C. Provide the appeals process referred to in section 106(b)(5) of WIOA relating to designation of local areas

A denied request for local area designation by the WTDB may be appealed to the Governor. An appeal must be submitted in writing and must include the reason for appeal, all material originally submitted for consideration, and any additional relevant material responding to the denial from the WTDB. The Governor will have 90 days to respond to the appeal and will respond in writing. The Governor may consult the WTDB as a part of the process of responding to the appeal. If a decision on the appeal for designation has not been rendered in 90 days or is denied, the requesting entity may request review by the Secretary of Labor. The Secretary may require that the area be designated as a workforce development area if the Secretary determines that the entity was not accorded procedural rights under the State appeals process, or if the area meets the designation requirements. The appeals process in Oregon that is required in section 106 can be found here.

## D. Provide the appeals process referred to in section 121(h)(2)(E) of WIOA relating to determinations for infrastructure funding

Any party to a local area's infrastructure agreement (IFA) may appeal infrastructure funding determinations to the local workforce development board. If the party is not satisfied with the local resolution, they may appeal to the Governor. To do so, the appeal must be submitted in writing to the Higher Education Coordinating Commission's Office of Workforce Investments and must include the reason for appeal, all material relevant to the reason for the appeal, and any additional relevant material related to the IFA. The Governor will have 90 days to respond to the appeal and will respond

in writing. The Governor may consult the WTDB as a part of the process of responding to the appeal. Oregon's current policy relating to WIOA section 121 is here.

### 2. Statewide Activities

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

#### Statewide Activities:

Oregon does administer state funds for use within the workforce development system. This state funding is flexible and provides the system the ability to innovate and use this funding as governor needs dictate.

Oregon posts all policies or guidance for the statewide workforce development system and for use of State funds for workforce investment activities on a publically-accessible website (currently www.wioainoregon.org). Current policies include:

#### WTDB Policies:

- Oregon Workforce and Talent Development Board Policy Minimum Training Expenditures
- Oregon Workforce and Talent Development Board Policy Priority of Service
- Oregon Workforce and Talent Development Board Policy Adult and Youth Funding
- Oregon Workforce and Talent Development Board Policy Dislocated Worker Funding

#### WIOA Policies:

- 106(b) Local Workforce Development Areas
- 107(b) Local Workforce Development Board Membership
- 107(c) Appointment and Certification of Local Workforce Development Boards
- 107(h) Conflict of Interest
- 121 Memorandum of Understanding and Cost Sharing
- 121(d) One-Stop Operator Procurement
- 121(g) One-Stop Certification
- 122(a) Eligible Training Provider List
- 129(a) Youth Eligibility
- 134(c) Career and Training Services

B. Describe how the State intends to use Governor's set aside funding. Describe how the State will utilize Rapid Response funds to respond to

layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also should describe any layoff aversion strategies they have implemented to address at risk companies and workers

While the state is ultimately responsible for the delivery of all Rapid Response services according to section 133(a)(2), OWI works in partnership with Local Workforce Development Boards (LWDB) and their designated Dislocated Worker Liaisons, to provide contracted Rapid Response services. These activities and services are designed to assist companies throughout the business cycle. A concerted effort will be made to avert layoffs. The State of Oregon prides itself on having a very collaborative and all-encompassing pre-layoff strategy that includes employers, workers, and partners. OWI's Dislocated Worker Unit, is responsible for the coordination of layoff activities throughout the state, providing technical assistance and training to a statewide network of Dislocated Worker Liaisons and Rapid Response Coordinators to ensure the highest level of services to affected workers in the State of Oregon.

The state holds back funds specifically to provide layoff aversion, rapid response and additional assistance to LWDBs. Rapid Response Funds can be utilized for pre layoff activities such as surveys, information sessions, on-site resource rooms, transition team set-up, peer advocates, etc.

Local Workforce Areas can access Additional Assistance Funds to provide layoff aversion activities, short term funding in cases where the closure or layoff does not meet DOL participant thresholds for a Dislocated Worker Grant (DWG) and gap fill funding for when a LWDB has a pending Dislocated Worker Grant (DWG) application. Funds may also be made available for Incumbent Worker, Customized Training, On-the-Job Training and other Supportive Services.

OWI and local Title I providers have an agreed upon Joint Communication Plan which is implemented whenever either party is notified of a layoff or closure, regardless of size. The Joint Communication Plan outlines a conversation that the local areas and state will have during any layoff or closure activities. These conversations determine next steps and inclusion of additional state and local partners and resources and if the services will be offered on site or at the local WorkSource Oregon centers.

The Worker Adjustment and Retraining Notice (WARN) is not the typical method in which the state receives notification or information about layoffs or closure. In the State of Oregon most layoffs or closures do not meet the thresholds required to activate the WARN Act. State and Local staff often learn about layoffs or closures through local media, local elected officials, local and state economic development partners, or affected workers contacting either the state or local WorkSource Oregon center. Layoff information is also gleaned from a variety of local print and on line sources, one of these sources is "Around the State" a weekly publication from the Oregon Employment Department, which is a compilation of information gathered by labor market analysts and regional economists throughout the state.

Rapid Response activities are unique to each closure or layoff. Rapid Response activities include information sessions on a variety of topics. All sessions will cover Unemployment Insurance, Health Insurance Marketplace, WorkSource Oregon services and Trade Adjustment Assistance, and Union specific information, if applicable. Other topics that may be included are Department of Human Services (DHS) services, such as Temporary Need to Needy Families (TANF) and Supplemental Nutrition Assistance Program (SNAP), Consumer Credit Counseling, and University and Community College partners. Services are determined by the needs of the affected workgroup and their employer in conjunction with local workforce staff and should be brought on site whenever possible. If the layoffs are trade related or the affected company is trade certified, then all relevant TAA requirements and guidelines are followed.

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

Should the Governor declare a state disaster, the Federal Emergency Management Agency (FEMA) may respond by also declaring a federal disaster. Once/if these two declarations are made, OWI will work with the local workforce board and its providers/partners to apply for a Disaster Recovery Dislocated Worker Grant. The purpose of these grants is to provide temporary disaster relief. This can happen in a limited number of ways but includes the following:

- Temporary employment to provide food, clothing, shelter and other humanitarian assistance for disaster victims;
- Demolition, repair, cleaning, renovation and reconstruction of damaged or destroyed public structures, facilities and lands located within the declared disaster area; and
- Training for people dislocated due to the disaster that need to be returned to gainful employment

An emergency declaration by Oregon's Governor is not sufficient to apply for funding assistance.

WIOA establishes DWGs, including grants for employment and training assistance and grants for disaster relief employment assistance. Significant changes under WIOA include:

- Authorizes DWGs to provide assistance to areas with a higher than average demand for employment and training services from dislocated members of the Armed Forces and military spouses.
- For Disaster Recovery DWGs, WIOA:
  - Allows Federal agency emergency or disaster declarations, in addition to those made by the Federal Emergency Management Agency, to trigger an opportunity for eligible entities to apply for assistance. The newly eligible situations must fit the definition of emergency or disaster situations of national significance that could result in a potentially large loss of employment, as declared or otherwise recognized by the chief official of a Federal agency with authority for the federal response to the emergency.
  - Allows circumstances where a substantial number of individuals from a disaster area relocate to another area to trigger an opportunity for eligible entities in the relocation area to apply for assistance.
  - Affirms eligibility for the grant program for self-employed individuals who become unemployed or significantly underemployed as a result of the emergency or disaster.
  - Increases the temporary employment duration from six months (under WIA) to 12 months. The Secretary of Labor may extend the duration of disaster relief employment for up to an additional 12 months.

D. Describe how the State provides early intervention (e.g., Rapid Response) to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed. (Section 134(a)(2)(A).) This description must include how the State disseminates benefit information to provide trade-affected workers in the groups identified in the TAA petitions with an accurate understanding of the provision of TAA benefits and services in such a way that they are transparent to the tradeaffected dislocated worker applying for them (Trade Act Sec. 221(a)(2)(A) and Sec. 225; Governor-Secretary Agreement). Describe how the State will use funds that have been reserved for Rapid Response to provide services for every worker group that files a TAA petition.

As part of the state's Rapid Response to layoffs and dislocation events, contact is made with the employer and Rapid Response services should, whenever possible, be scheduled to begin within 24 hours. As part of these services, the Dislocated Worker Liaison/Rapid Response Coordinator will coordinate with the local area Rapid Response team members, which includes the local Trade Act Navigator.

The Dislocated Worker Unit and the Trade Act Leadership Team participate in statewide strategy meetings as needed to plan Rapid Response activities and participate in statewide Rapid Response training to staff. The Trade Act Leadership Team provides statewide communication on all petition activity. During a Rapid Response where Trade has been identified, the Trade Act Navigator (TAN) will provide a high-end overview of Trade Adjustment Assistance services and benefits, and instructions on how to follow the status of their petition.

Trade Act Navigators (TANs) are a part of the local Rapid Response Team and collaborate with WorkSource Oregon staff, the local board, and the Central Trade Act Unit to meet dislocated worker needs. The Trade Act Petition Coordinator will communicate with stakeholders if a petition for Trade Act has been, or will be, filed for planning efforts. TANs facilitate Trade Act Information Sessions (TAIS) providing an overview of potential Trade Act benefits and next steps following notification of an approved petition.

Oregon's Unemployment Insurance (UI) program participates in early intervention to worker groups on whose behalf a Trade Adjustment Assistance petition has been filed. UI staff are members of the cross-agency team for Rapid Response

## b. Adult and Dislocated Workers Program Requirements

### 1. Work-Based Training Models

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

Oregon is utilizing work-based training models including on-the-job training (OJT), incumbent worker training (IWT), transitional jobs, and customized training as part of its training strategy and these models ensure high quality training for both participants and employers.

WIOA and TAA pursue high quality, OJT opportunities with employers and make appropriate OJTrelated referrals for work-ready job seekers based on the talent of the participant and the need(s) of the employer. OWI has included apprenticeships as a focus in the state workforce efforts that also includes industry strategies and local board support. TAA works with the Apprenticeship Program Liaison on opportunities to develop relationships with local apprenticeship programs and training centers to make this training model available to customers.

## 2. Registered Apprenticeship

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

The Oregon Employment Department (OED), in conjunction with the Apprenticeship Training Division (ATD) of the Bureau of Labor and Industries (BOLI), has worked over the past several years to train staff and workforce system partners on the basics of registered apprenticeship. Registered apprenticeship training is now offered to every new WorkSource Oregon staff person as part of their onboarding process. This training gives staff a foundation of registered apprenticeship knowledge and the tools to assist a job seeking customer in navigating the registered apprenticeship system. Apprenticeship connections in WorkSource Centers are primarily focused on how to connect job seekers to registered apprenticeship programs. While this is an important component of offering apprenticeship services in WorkSource Centers, OED will work to increase the registered apprenticeship connections WorkSource can offer to businesses.

More training is needed to promote registered apprenticeship to the business community and help employers access the registered apprenticeship system. OED staff will work to integrate registered apprenticeship into business service teams across the state and increase the local connections between Apprenticeship and Training Division and WorkSource staff. WorkSource staff will be trained on how to identify an apprenticeable occupation, occupations that are a good fit for registered apprenticeship, and the first steps to register an apprenticeship program. WorkSource Staff will also be asked to increase their connection to existing registered apprenticeship programs by offering to help with their recruitment or retention needs.

In order for WorkSource staff to increase their business engagement around registered apprenticeship, they will need more modern outreach materials and better tools to attract businesses. The Oregon Employment Department, Higher Education Coordinating Commission, and the Apprenticeship and Training Division are working to update the website www.oregonapprenticeship.org and to create marketing materials that speak to industries outside of construction. Staff will be better equipped to promote registered apprenticeship to a broader audience once they are able to utilize profiles of manufacturing, healthcare, and technology companies that have chosen to use registered apprenticeship in their outreach materials. The Apprenticeship and Training Division is also working to modernize its IT systems to demonstrate that registered apprenticeship is a 21<sup>st</sup> century workforce solution. By the end of 2020, the Apprenticeship and Training Division will be able to accept all apprenticeship paperwork electronically, which will help remove some administrative barriers to the participation of smaller businesses in registered apprenticeship.

## 3. Training Provider Eligibility Procedure

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

Oregon has developed a policy and procedures relating to all requirements for eligible training providers. Oregon has developed separate applications for initial eligibility determinations and registered apprenticeships, and creates customized applications for the determination of continued eligibility. Additionally, Oregon has reciprocal agreements in place that recognize the ETP lists of several other states.

All policies, procedures, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs for the State of Oregon are posted on our publicly accessible website here.

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

As previously described in the plan, the coalition of executive managers, including representatives from the six core programs and TANF and SNAP, work together on policies and with the state and local boards to streamline processes and foster collaboration across the workforce system. The agencies will work together and make decisions together to result in a more cohesive workforce system in Oregon with better communication and collaboration. The agencies will involve their stakeholder and advocacy groups in order to ensure that there is a variety of ideas and opinions included in state-level planning and to ensure the support and assistance of these groups during implementation of WIOA.

Local, state-agency-branch, and field office managers from core and mandatory partners will work with their LWDBs to ensure that those receiving public assistance, low-income individuals, and those who are basic skills deficient are included in local WIOA plans and that they have a voice in the system, including the following activities:

- Attendance at LWDB meetings and participation on planning and programmatic committees by state agency managers for Vocational Rehabilitation, TANF, and SNAP.
- Participation in local planning processes to build relationships and help local plans lift those most in need out of poverty, while understanding that each local plan will look different depending on the economic and demographic makeup of the local area.

Oregon will use the Statistical Adjustment Model under WIOA to ensure that local performance measures are based on actual local conditions and characteristics of participants. Local areas will apply the model to ensure that people receiving public assistance benefits, in low-income situations, or who are basic skills deficient are receiving the training and services that they need. The exact results and methods in each local area may vary slightly based on economic situations and local demographics.

The core and mandatory state agencies do not believe that clients receiving TANF, SNAP, or Vocational Rehabilitation services should be required to identify themselves when entering a WSO center. Clients on public assistance, with disabilities, or belonging to a low-income category are often uncomfortable or reluctant to divulge this information due to fear of discrimination or feelings of low self-esteem. The agencies will work to find a way to market WIOA services to the above categories of individuals to ensure that they are aware of services and that they may use their classification to ensure priority of service. Staff at the WSO centers and affiliate sites will be trained to understand that upon discovery that an individual belongs to a priority category that priority of service will be explained to that individual. Basic skills deficient individuals can be identified through Initial Skills Review testing in the WSO centers, through AccuVision (soft skills) testing, and the National Career Readiness Certificate (both available in English and Spanish). Basic skills deficient individuals can be identified for priority of service and can be expedited into job search and occupational skills training programs.

Current state data systems only allow for "after the fact" matching of clients participating in various WIOA programs to priority of service categories. The core and mandatory agencies involved under WIOA will work together to establish a better system for data sharing among agencies and other partners to better track the various categories of WIOA service participants and for easier identification of priority groups under WIOA who are being underserved. Improvements to data systems and sharing will take time over the course of WIOA implementation.

Oregon requires Local Workforce Development Boards (WDBs) to establish a policy to provide priority for individualized career services and training services to recipients of public assistance, other lowincome individuals, and individuals who are basic skills deficient and veterans. Local WDBs must establish practices that support Oregon's priorities as identified by the Governor and the Oregon Workforce Talent and Development Board (WTDB). Oregon's *Priority of Service* policy can be found here. Components of this policy are incorporated in Oregon's monitoring guidance and process to ensure adherence to this state policy.

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

A local WDB may transfer:

- Up to 100% of a program year allocation\* for adult employment and training activities to dislocated worker activities
- Up to 100% of the program year's allocation for dislocated worker employment and training activities may be transferred to adult employment and training activities.

(\* "program year allocation" from 20 CFR 683.130 has the same meaning as "base allocation", used elsewhere in this State Plan.)

Before making such a transfer, a local WDB must obtain written approval from the Office of Workforce Investments (OWI).

Prior to any transfer of adult employment and training funds or dislocated worker employment and training funds, local WDBs must submit a letter to OWI for approval to transfer the funds. The letter must be in the form of a request for a local plan modification and include the following criteria for review and approval by OWI:

- 1. The reason(s) for the request to transfer funds and the percentage the transfer represents of the program allocation;
- 2. The fund source of the transfer;
- 3. The amount of funds involved in the transfer;
- 4. A program analysis that includes:
  - a. An assurance that the transfer of funds will not have an adverse impact in providing services to participants and that necessary services and participant planned activities will be maintained in the program from which the funds are transferred;
  - b. The labor market conditions contributing to the need for the transfer;
  - c. A discussion of the local area's past history of the request for transfers and how previous transfers impacted participants and funds;
  - d. If funds are transferred from the dislocated worker program, the analysis must provide a strategy the local WDB will employ to ensure that dislocated workers affected by unanticipated layoffs or closures will receive required rapid response services; State of Oregon Workforce Programs 2 (e) Current cash draws versus yearto-date expenditures for Adult and Dislocated Worker programs.

A local WDB may request a transfer of funds anytime during the program year. The local area must confirm that this transfer will not reduce the required rate of expenditure of the fund source to which funds are transferred by the end of the program year. The Department of Labor requires that 80% of the WIOA title I Adult and Dislocated Worker resources be expended or obligated by the end of each program year.

The transfer request must be accompanied by the local WDB meeting minutes that include the board request for approval of the transfer. The minutes must also reflect that at least one labor board member was present at the local WDB meeting at which the transfer was discussed and acted upon.

# c. With respect to youth workforce investment activities authorized in section 129 of WIOA—

With respect to youth workforce investment activities authorized in section 129 of WIOA-

1. Identify the State-developed criteria to be used by local boards in awarding grants or contracts for youth workforce investment activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) of WIOA in awarding such grants or contracts.[11]

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

Oregon encourages local areas to develop youth programs that will provide paid work experiences, provide labor market information and opportunities to connect to local in—demand sectors, and support post-secondary transition and retention. Oregon aims to increase the number of individuals that obtain a post-secondary education. Oregon's goal is that by 2025, 40 percent of Oregonians will have a baccalaureate degree or higher, 40 percent will have an associate's degree or certificate in a skilled occupation, and for the 20 percent without post-secondary credential to have at least a high school diploma or its equivalent.

As allowed under WIOA, local areas determine and establish their individual youth program design for WIOA youth funds. Some local strategies used to deliver the WIOA program elements include:

- Partnering with local industry sectors and business to offer occupational skills training.
- Job readiness training and ongoing job coaching including job search, resume writing, interviewing skills and soft skills development.
- College preparation including campus tours.
- Computer skills workshops and general tutoring.
- Mentoring opportunities.
- Career awareness and exploration.
- Money management and hands-on cash handling.

2. Describe the strategies the State will use to achieve improved outcomes for out-of-school youth as described in 129(a)(1)(B), including how it will leverage and align the core

### programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available.

The state Workforce and Talent Development Board recently approved a new 2020-2021 strategic plan in which several priorities were created that will help improve outcomes for out-of-school youth including:

- Identify all resources available in the system, including those that support underrepresented populations, and align for greater results,
- Align K-12, community colleges, universities, workforce and employers with legislative strategy and changes, including essential employability skills
- Coordinate and streamline the workforce system so job seekers and employers find what they need more efficiently

3. Describe how the state will ensure that all 14 program elements described in WIOA section 129(c)(2) are made available and effectively implemented, including quality pre-apprenticeship programs under the work experience program element. [12]

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

To ensure that the 14 program elements are effectively implemented, the state will evaluate program performance on an annual basis. Monitoring and program improvement processes will be developed to align with the new requirements under WIOA. Local plans must include local board actions to become or remain a high-performing board. The factors that will be used to determine this will include effectiveness and continuous improvement.

The state will also ensure that all 14 program elements are made available by reviewing each local plan which must include an analysis and description of youth workforce activities, including activities for youth with disabilities. Local plans must also identify successful models and best practices, for youth workforce activities relevant to the local area.

4. Provide the language contained in the State policy for "requiring additional assistance to enter or complete an educational program, or to secure and hold employment" criterion for out-of-school youth specified in WIOA section 129(a)(1)(B)(iii)(VIII) and for "requiring additional assistance to complete an education program, or to secure and hold employment" criterion for in-school youth specified in WIOA section 129(a)(1)(C)(iv)(VII). If the state does not have a policy,

# describe how the state will ensure that local areas will have a policy for these criteria.

The State defers to local areas to determine the need for and to develop criteria and policy for additional assistance to enter or complete an educational program, or to secure and hold employment. When a Local Workforce Development Board does establish these criteria, the following policy conditions/language must be met:

- Distinguish separate elements/definitions for In-School Youth (ISY) and Out-of-School Youth (OSY) participants.
- Barriers already established by the WIOA cannot be included in the local Needs Additional Assistance policy.
- Required documentation must be identified and defined for each criterion established.
- In a single program year, not more than 5 percent of the ISY served can be determined eligible using these criteria.

Local areas that choose to use this criteria in their OSY or ISY eligibility must create a policy that is adopted by the local board and included in the Local Plan.

5. Include the State definition, as defined in law, for not attending school and attending school as specified in WIOA Section 129(a)(1)(B)(i) and Section 129(a)(1)(C)(i). If State law does not define "not attending school" or "attending school," indicate that is the case and provide the state policy for determining whether a youth is attending or not attending school.

Oregon has developed definitions for this purpose.

Not attending school: Not attending any school as defined by State law as:

- 1. A youth who does not have a GED or secondary diploma and is not enrolled in secondary education; or
- 2. A youth who has a GED or secondary diploma and is not enrolled in post-secondary education; or
- 3. A youth who is attending an alternative education program, an adult education program under title II (ABE/ESL), or YouthBuild or Job Corps programs.

Attending school: Attending school as defined by state law as:

1. A youth who is enrolled in secondary or post-secondary education including GED and homeschool.

[Note: ORS 660.310 provides that for the purposes of WIOA, an individual enrolled in alternative education programs, as provided by ORS 336.615 to 336.675, may be considered an out-of-school youth. (Exception: TEGL 21-16 provides that youth attending high school equivalency programs, including those considered to be dropout re-engagement programs, funded by the public K-12 school system who are classified by the school system as still enrolled in school are considered In-School Youth.)]

6. If using the basic skills deficient definition contained in WIOA Section 3(5)(B), include the State definition which must further define how to determine if an individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society. If not using the portion of the definition contained in WIOA Section 3(5)(B), indicate that is the case.

In Oregon, Basic Skills Deficient means an individual who:

- 1. Is a youth that has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test?
- 2. Is a youth or adult that 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?

The state defers to Local Workforce Development Boards to develop criteria and policy for the second part of the definition. When a Local Workforce Development Board does establish these criteria, the following policy conditions must be met:

- The Local Board must further define what will determine if a youth is unable to demonstrate these skills well enough to function on the job, in the individual's family or in society.
- In assessing basic skills, local programs must use assessment instruments that are valid and appropriate for the target population, and must provide reasonable accommodation in the assessment process, if necessary, for people with disabilities.
- Local programs must test individuals on a generally accepted standardized test to determine basic skills deficient eligibility.
- Criteria and policy must be included in the Local Plan.

### d. Single-area State Requirements

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

1. Any comments from the public comment period that represent disagreement with the Plan. (WIOA section 108(d)(3).)

2. The entity responsible for the disbursal of grant funds, as determined by the governor, if different from that for the State. (WIOA section 108(b)(15).)

3. A description of the type and availability of WIOA title I Youth activities and successful models, including for youth with disabilities. (WIOA section 108(b)(9).)

Not applicable.

4. A description of the roles and resource contributions of the one-stop partners.

Not applicable.

5. The competitive process used to award the subgrants and contracts for title I activities.

Not applicable.

6. How training services outlined in section 134 will be provided through individual training accounts and/or through contracts, and how such training approaches will be coordinated. Describe how the State will meet informed customer choice requirements regardless of training approach.

Not applicable.

7. How the State Board, in fulfilling Local Board functions, will coordinate title I activities with those activities under title II. Describe how the State Board will carry out the review of local applications submitted under title II consistent with WIOA secs. 107(d)(11)(A) and (B)(i) and WIOA sec. 232.

Not applicable.

8. Copies of executed cooperative agreements which define how all local service providers will carry out the requirements for integration of and access to the entire set of services available in the one-stop delivery system, including cooperative agreements with entities administering Rehabilitation Act programs and services.

Not applicable.

## e. Waiver Requests (optional)

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

1. Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;

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

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

4. Describes how the waiver will align with the Department's policy priorities, such as:

- A. Supporting employer engagement;
- B. Connecting education and training strategies;
- C. Supporting work-based learning;
- D. Improving job and career results, and
- E. Other guidance issued by the department.

5. Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment; and

6. Describes the processes used to:

A. Monitor the progress in implementing the waiver;

B. Provide notice to any local board affected by the waiver;

C. Provide any local board affected by the waiver an opportunity to comment on the request;

D. Ensure meaningful public comment, including comment by business and organized labor, on the waiver.

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

# 7. The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.

Oregon WIOA Waiver Request 1

#### Submitted April 4, 2020

# Requirement that 75% of funds available to local areas shall be used to provide youth workforce investment activities for out-of-school youth:

The State of Oregon's Higher Education Coordinating Commission, Office of Workforce Investments (HECC-OWI) is seeking a waiver from WIOA Section 129(4)(A) and 20 CFR 681.410 which require not less than 75 percent of funds allotted to states under Section 127(b)(1)(C), reserved under Section 128(a), and available for statewide activities under subsection (b), and not less than 75 percent of funds available to local areas under subsection (c), shall be used to provide youth workforce investment

activities for out-of-school youth (OSY).

Specifically, HECC-OWI requests waiver authority starting in PY 2020 for the following:

- 1. A waiver of the requirement to expend 75 percent of funding on the OSY population. Oregon is requesting that this percentage be lowered to 50 percent.
- 2. A waiver of the requirement to expend 75 percent of Statewide Activities funding on the OSY population. Oregon is requesting that this percentage be lowered to 50 percent.

These waiver requests are consistent with Oregon Governor's vision to create a seamless system of education, where every student graduates high school with a plan for their future. The Alliance for Excellent Education calculated that for all metro areas in the State of Oregon, increasing the graduation rate to 90 percent could mean 300 new jobs, \$8.2 million in state and local tax revenue, and \$92 million in healthcare savings<sup>1</sup>.

#### Actions to Remove Barriers:

There is currently no state or local statutory or regulatory barrier to implementing the requested waiver.

#### Strategic Goals of Requested Waiver:

Goal - Assist Oregon in its efforts to increase high school graduation rates.

Expected Outcome – This waiver will allow Oregon WIOA Youth Programs the opportunity to serve double the current number of in-school students who have been identified as most at risk to disengage from school. This 1:1 WIOA engagement will help students to stay in school and identify an education or career pathway for successful transition after high school completion.

Goal – Benefit the Oregon economy.

Expected outcome – This waiver will allow WIOA Youth the opportunity to receive work-based learning opportunities through work experience, internships, and occupational skills training. Skilled workers are necessary to contribute to the state's economic vitality during a record period of economic growth. Research clearly shows that high school graduates are more likely to be employed, less likely to live in poverty, less likely to have children who also live in poverty, and more likely to be in good health compared to those who don't graduate.

Goal – Provide WIOA Program Services to a larger percentage of low-income Oregon youth.

Expected Outcome – This waiver will allow WIOA program staff to partner with Oregon high schools to identify low income students who are most in need, provide necessary services, and leverage federal funding for positive results.

Goal - Serve more in-school youth in rural communities.

Expected Outcome – In the remote areas of Oregon, schools are often the only way to connect with students. Once students leave school, they are difficult to locate. It is important that WIOA program staff have the opportunity to coordinate WIOA program supports for more in school rural youth while they are still attending school.

Goal - Increase student engagement to prevent state dependency.

Expected Outcome – Research clearly shows that it is much more effective to keep youth enrolled in school vs. trying to re-connect and re-engage students who have dropped out. This WIOA waiver will support that return on investment as fewer students will drop out and become disengaged.

#### Programmatic Outcomes from Implementation of the Waiver:

Oregon is the 9th largest state in the United States in terms of land area but has a population that is sparsely spread by comparison with an estimated 2019 population count of 4.25 million – 87% of it being concentrated on the western side. These numbers currently make Oregon the 39th most densely populated state in the country. Geography plays a huge part - mountain ranges, forests, and large desert areas are some of the features that impact population density. Because of its large geographic area, Oregon faces many unique and varied educational/economic challenges of contrasts affecting graduation rates, workforce opportunities, family income levels, student equality, and disengaged students/dropouts<sup>2</sup>. Within these challenges, high school graduation rates vary from region to region and school to school. Oregon's high school graduation rate, despite recent improvements, continues to leave too many students behind. Oregon's graduation rate for 2016-17 was 76.65%. In state-by-state comparison data, this rate ranks Oregon as third lowest in the nation and well below the national average of 84.6%<sup>3</sup>.

Oregon's large and unique geographic areas contribute to the state's lower graduation rate and income inequality. During the 2017-18 school year, low-income Oregon youth, regardless of ethnicity, graduated 6 points below the state average<sup>4</sup>. The Annie E. Casey Foundation released a study several years ago that found that 32% of students that spent more than half their childhood in poverty failed to graduate from high school compared to 6% of those who never lived in poverty<sup>5</sup>. Oregon's urban counties tend to have higher median household incomes than those living in rural counties. Nine out of the top 10 counties with the highest household incomes are in metropolitan statistical areas. Despite a historic period of economic growth, family incomes have stagnated and nearly half of the children in Oregon are being raised in low-income families. Due to increases in housing and childcare costs, two-thirds of low-income children in Oregon live in households that spent more than a third of their income on rent or mortgage payments<sup>6</sup>.

In alignment with Oregon's low graduation rate, approximately a fourth of Oregon students who were high school freshmen four years ago will not receive any kind of diploma this spring<sup>7</sup>. The most recent number of dropouts was 6,401 students for the 2017-18 school year. National estimates show that for each student who drops out of school and is disengaged from work creates a tax burden of \$13,900 per year. Based on this estimate, the 6,401 students who dropped out of high school, assuming they remain disengaged from school and work, represent an immediate yearly tax burden of \$88,973,900. Re-engaging the same number of youth would cost an estimated \$2,000/youth or \$12,802,000 – a yearly savings of \$76,171,900 in tax payer dollars. The return on investment to support focused work with high school students who are at risk of dropping out is a key to overcoming the tax burden on the state public system in comparison to students who stay in school and graduate<sup>8</sup>.

There is clearly much work to be done. To overcome the stated educational challenges regardless of family income/geographic location, and other barriers, Oregon must ensure that all school districts are investing in resources for students that support them to stay engaged in school, graduate with their high school diploma, and achieve their full potential. At this time when education funds are limited and school graduation performances are well below the national average, it is important to align all available resources and leverage funding. Approval of this waiver will allow Oregon WIOA Youth Programs the opportunity to develop stronger relationships and partner directly with more local high schools, alternative schools, parents, community organizations, post-secondary education/training partners and local industry to provide additional and necessary services to those in school students who are at most risk of dropping out. It is important that these students be provided the necessary supports for their educational needs, family environment, income, and geographical location that are varied and unique to the State of Oregon.

#### Individuals, groups or populations impacted by the Waiver:

Providing drop-out prevention services to more in-school youth will impact populations including, but not limited to:

- Oregon's at-risk youth
- Low-income families
- Oregon economy
- Oregon taxpayers
- Rural communities
- Local Workforce Development Boards
- Contracted service providers
- Teachers and school counselors

#### **Monitoring Waiver Implementation:**

Annual WIOA on-site programmatic reviews will include an evaluation of the impact of the waiver on local programs to ensure programmatic goals and outcomes are being met. Additionally, State staff will periodically examine the effectiveness of this waiver. This strategy ensures that the goals described above, as well as those outlined in Oregon's WIOA State Plan, are consistent with established objectives of the WIOA and federal and state regulations.

#### Notice to Local Boards and Public Comment:

The Higher Education Coordinating Commission's Office of Workforce Investments (HECC-OWI) posted a draft copy of this waiver request on their publicly accessible website (www.wioainoregon.org) on February 7, 2020. On the same date, the Office of Workforce Investments sent copies of the waiver request to all local workforce development boards and other stakeholders. In both cases, a thirty-day public comment period was announced. A draft copy of this waiver request and a description of the public comment period and process remains on the website.

During the comment period, the Office of Workforce Investments received no substantive inquiries or comments from any source.

Upon approval of the waiver, HECC-OWI will issue a Guidance Statement notifying all Local

Workforce Development Boards of its approval. As appropriate, waivers and related information will be included in the Oregon WIOA State Plan submission and/or modification and subject to public comment within the Plan guidelines and the WIOA requirements outlined in WIOA regulations at 20 CFR 676.130(d). Oregon will collect and report information about waiver outcomes in the State's WIOA Annual Report.

<sup>1</sup>The Graduation Effect Website by the Alliance for Excellent Education

#### <sup>2</sup>Wikipedia Page for Oregon

<sup>3</sup> High School Graduation Rates up in Oregon, Closer to US Rate, U.S. News & World Report, January 24, 2019.

<sup>4</sup> Oregon's Graduation Rate Improves, But Achievement Gap Persists, Oregon Public Broadcasting, January 24, 2019

<sup>5</sup> Education Policy Agenda: Every Oregon Student Engaged, Empowered, and Future Ready, Oregon Governor's Office, August 27, 2018

<sup>6</sup> High School Dropout Rate Resources, Oregon School Boards Association

<sup>7</sup> A Closer Look at Oregon's Median Household Income, Oregon Employment Department, QualityInfo, March 1, 2019

<sup>8</sup> The Economic Value of Opportunity Youth, for the Corporation for National and Community Service and the White House Council for Community Solutions, January 2012

#### Oregon WIOA Waiver Request 2

#### Submitted December 6, 2019

#### Requirement to collect and report performance data on all students in programs on the state's Eligible Training Provider List

The State of Oregon's Higher Education Coordinating Commission Office of Workforce Investments (HECC-OWI) is seeking a waiver of the required collection and reporting of performance data on all students participating in training programs listed on the state's Eligible Training Providers List (ETPL), as outlined in the Workforce Innovation and Opportunity Act (WIOA) Sections 116 and 122, and at 20 CFR 677.230 and 20 CFR 680.400 through 680.530.

Specifically, HECC-OWI requests waiver authority to report a "0" in the eligible training provider performance report for the nine data elements related to all individuals in training (data elements 120 through 128 on form EA 9171) for programs of study where the data is not currently available.

Under WIOA Section 116(d)(4)(A) and 20 CFR 677.230(a)(5), Eligible Training Providers(ETP) must report performance data with respect to all individuals engaging in a program of study (or the equivalent). While HECC-OWI recognizes the value and importance of monitoring provider performance, requiring ETPs to produce data on all students above and beyond WIOA-funded participants will discourage training provider participation, which is a critical component of the workforce development system. Reporting becomes especially burdensome when:

- ETPs have many students of whom only a small percentage are WIOA participants, and; ETPs do not have the existing staff to perform the required data gathering process, and cannot hire the additional staff.
- Many providers express a concern regarding the protection of personally identifiable information, especially social security numbers, which would have to be collected by the providers themselves.

- Questionable accuracy of student records based on self-reported data from ETPs.
- HECC-OWI does not currently have the necessary data collection and validation tools to comply with this requirement.

The federal requirements would create a hardship for many training providers resulting in a decreased number of programs applying for inclusion on the ETPL. This would lead to Oregon having a less robust list of training providers, thereby limiting consumer choice. As well as developing new submission processes, the HECC-OWI has been working to create a new interface and data warehouse for use by training providers and state agencies when submitting and utilizing data.

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. This request is submitted in accordance with the Secretary's waiver authority outlined in Section 189(i)(3)(B) of WIOA and 20 CFR 679.620.

#### Actions to Remove Barriers:

There is currently no state or local statutory or regulatory barrier to implementing the requested waiver. The State of Oregon regulations and policy statements are in compliance with current federal law.

#### Strategic Goals of Requested Waiver:

State strategic goals supported by the waiver include:

- More numerous and varied training offerings for individuals utilizing individual training accounts (ITA) via the public workforce system leading to greater consumer choice.
- Increased participation among training providers which may lead to lower cost and more robust demand-driven training options.
- Greater utilization of the ETPL by individuals pursuing training in Oregon related to jobs that are in-demand by employers.
- Stronger partnerships between training providers and the public workforce system.

#### Programmatic Outcomes from Implementation of the Waiver:

The reduction of the reporting burden fosters a wider variety of training offerings for individuals utilizing Individual Training Accounts (ITAs) via the public workforce system. A wider variety of training programs can lead to lower cost and more robust demand-driven training options. Greater utilization of the ETPL by individuals pursuing training via ITAs in Oregon related to jobs that are in-demand by employers now and in the future. Reducing the reporting burden also creates stronger partnerships and relationships between training providers and the public workforce system.

#### **Continued Eligibility:**

To address the State's responsibility to maintain a procedure whereby eligible training providers and programs may maintain their continued eligibility as provided in 20 CFR 680.460, Oregon will explore several options, including:

• Using alternate data sources. Some programs or providers in Oregon have reporting systems that run parallel, but don't exactly overlap with the WIOA performance measures. After

examination of the data available, Oregon may consider using (some of) this information as part of our criteria for determining continued eligibility; and/or

• Developing criteria and weighting factors that do not rely exclusively on the performance measures/data described in WIOA or in Oregon's Eligible Training Provider Policy. These criteria and factors may include information from the alternate data sources (preceding bullet).

As Oregon develops its continued eligibility criteria, we will solicit feedback from local workforce development boards and other stakeholders.

#### Individuals, groups or populations impacted by the Waiver:

The reduction of reporting burden on ETPs will have a significant impact on multiple populations of the public workforce system, including, but not limited to:

- Individuals who access training services in Oregon via ITAs
- Oregon HECC-OWI staff
- Local Workforce Development Boards
- American Job Center staff
- Staff and administrators of ETPs

#### **Monitoring Waiver Implementation:**

Annual WIOA on-site programmatic reviews will include an evaluation of the impact of the waiver on local programs to ensure programmatic goals and outcomes are being met. Additionally, State staff involved with the administration of the ETPL and performance reporting will periodically examine the effectiveness of this waiver. This strategy ensures that the goals described above, as well as those outlined in Oregon's WIOA State Plan, are consistent with established objectives of the WIOA and federal and state regulations.

Assurance of Notice to Local Boards and Public Comment Period: The Higher Education Coordinating Commission's Office of Workforce Investments (HECC-OWI) posted a draft copy of this waiver request on their publically accessible website (www.wioainoregon.org) on August 13, 2019. On the same date, the Office of Workforce Investments sent copies of the waiver request to all local workforce development boards and other stakeholders. In both cases, a thirty-day public comment period was announced. A draft copy of this waiver request and a description of the public comment period and process remains on the website.

During the comment period, the Office of Workforce Investments received one inquiry from a local workforce development board. The board asked questions about HECC-OWI's development of a new interface and data warehouse for use by training providers and state agencies when submitting and utilizing ETP data, and about current data collection and reporting practices. HECC-OWI received no comments germane to the waiver itself.

### Title I-B Assurances

The State Plan must include assurances that:

The State Plan must include	Include
1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;	Yes
2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;	Yes
3. The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;	Yes
4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);	Yes
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;	Yes
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;	Yes
7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);	Yes
8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;	Yes
9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;	Yes
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.	Yes
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);	Yes

### Adult Program Performance Indicators

#### Performance Goals for the Core Programs

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

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of

performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

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

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

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

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

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

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

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

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

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

However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

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

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

Performance Indicators	PY 2020	PY 2020	PY 2021	PY 2021
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter After Exit)	71.2%		71.4%	
Employment (Fourth Quarter After Exit)	69.2%		69.4%	
Median Earnings (Second Quarter After Exit)	\$6,200		\$6,400	
Credential Attainment Rate	45.2%		45.4%	
Measurable Skill Gains	50.0%		51.0%	
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

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

### **Dislocated Program Performance Indicators**

#### Performance Goals for the Core Programs

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

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

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

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

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

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

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

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

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

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

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

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

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

Performance Indicators	PY 2020	PY 2020	PY 2021	PY 2021
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter After Exit)	71.2%		71.4%	
Employment (Fourth Quarter After Exit)	69.2%		69.4%	
Median Earnings (Second Quarter After Exit)	\$6,200		\$6,400	
Credential Attainment Rate	45.2%		45.4%	
Measurable Skill Gains	50.0%		51.0%	
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

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

### Youth Program Performance Indicators

#### Performance Goals for the Core Programs

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

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

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

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

- Credential Attainment Rate; and
- Measurable Skill Gains

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

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

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

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

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

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

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

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

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

Performance Indicators	PY 2020	PY 2020	PY 2021	PY 2021
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter After Exit)	62.7%		62.9%	

Performance Indicators	PY 2020	PY 2020	PY 2021	PY 2021
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Fourth Quarter After Exit)	59.2%		59.4%	
Median Earnings (Second Quarter After Exit)	\$2,900		\$3,300	
Credential Attainment Rate	68.2%		68.4%	
Measurable Skill Gains	50.0%		51.0%	
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

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

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

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

### a. Employment Service Staff

1. Describe how the State will staff the provision of labor exchange services under the Wagner-Peyser Act, such as through State employees, including but not limited to state merit staff employees, staff of a subrecipient, or some combination thereof.

All Wagner-Peyser services are currently provided by state merit staff.

### 2. Describe how the State will utilize professional development activities for Employment Service staff to ensure staff is able to provide high quality services to both jobseekers and employers

Wagner-Peyser Act Program (Employment Services)

Professional Development Activities for Employment Service Staff

Workforce Operations' leadership launched the WorkSource Oregon Training Team in 2018 creating 9 permanent positions located throughout the state. Its purpose is to ensure staff receive up-to-date training on career coaching, customer service, and programs administered through the 37 WorkSource centers. The Training Team is stationed in WorkSource centers across the state where they can provide individualized coaching of staff and design trainings to meet area and sector specific needs.

The Training Team has developed training for staff regarding Veteran programming including priority of service and supporting SNAP Employment and Training recipients in job seeking. This team

provides in person and virtual learning events for Unemployment Insurance and WorkSource centers to understand and strategize how to better serve our common customer to reduce issues of overpayment and get them back to work faster. This is in addition to collaborating with program coordinators in hosting conferences for staff, developing eLearning, and building a new onboarding model that efficiently prepares staff to deliver services. The Training Team also works with local management to identify gaps in knowledge and skills, allowing the team to proactively develop learning to reduce errors and meet quality measures.

The current design and implementation of the Training Team is adept at supporting Workforce Operations goals and priorities. The Training Team will continually expand learning opportunities to keep staff up to date on the latest career coaching and job application trends.

### 3. Describe strategies developed to support training and awareness across core programs and the Unemployment Insurance (UI) program and the training provided for Employment Services and WIOA staff on identification of UI eligibility issues and referral to UI staff for adjudication

#### Employment Services Staff Trained to Identify UI Eligibility Issues

The WorkSource Oregon and Unemployment Insurance (WSO/UI) Connectivity Group includes management and line staff from both Employment Services and UI programs. Members of the group discuss issues that pertain to the shared UI customer and their overall experience with the system. The team also identifies potential training opportunities. For example, throughout 2019, staff attended a 'joint' training session that was developed and delivered to educate staff from both programs regarding their respective roles within the agency and services offered to our shared customers. The purpose was to better understand the work the agency performs, how we work together between programs to assist our customers, and to promote ideas of how we can more effectively serve these customers. Program technicians also offer bi-monthly webinars to discuss relevant topics, answer questions, and provide opportunity to connect with both ES and UI staff. Additionally, new ES staff receive training on basic UI topics as they are on-boarded, both in person and virtually.

This work has a dedicated trainer assigned to focus on developing, managing, and delivering the training solutions proposed by the WSO/UI Connectivity Group. ES and UI staff are co-trained on identifying potential UI eligibility issues and making appropriate referrals to UI staff and awareness of current programs and resources that support claimants in meeting their basic needs, seeking employment, and maintaining UI eligibility. Training and resources will continue to be updated as needed.

In calendar year 2019, there were 1,918 potential UI issues reported to UI by WSO staff. These issues were detected through Reemployment Services and Eligibility Assessment (RESEA) conversations and general "Welcome" conversations (one-on-one intake and registration sessions with claimants).

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 Meaningful Assistance to UI Customers through WorkSource Oregon Centers

Reemployment Assistance to UI claimants

Front line staff in WorkSource Oregon (WSO) centers will receive special training to help guide customers in filing for unemployment insurance benefits and to connect them with appropriate resources to address questions and issues related to their unemployment claim. Resources to assist customers in centers include access to the online claims system, phones for connecting with UI staff and claiming weekly benefits, pamphlets and brochures regarding UI information, and several online videos addressing frequently asked UI questions such as how to file an initial claim for benefits, how to report weekly earnings, and how to report work seeking activities. Employment Services staff and partner staff in WSO centers also maintain the ability to email or call UI program staff in the UI Contact Center and in the UI Operations and Program Support Unit to get direct assistance to help customers when necessary.

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

#### Reemployment assistance to UI Claimants

WorkSource Oregon (WSO) centers offer a variety of services to all customers, including Unemployment Insurance (UI) claimants, to assist them with their efforts in becoming job ready and/or finding new work. All unemployed customers, including UI claimants, visiting a WSO center and seeking staff-assisted services complete initial enrollment activities. These activities include eligibility determination for workforce programs and services and registration in the state's job matching system (iMatchSkills). This process includes a one-on-one meeting with a workforce representative who reviews the customer's registration to ensure a quality profile for job matching, provides an overview of workforce services and training programs, provides customized labor market and career information for informed decision making, and refers the customer to reemployment and training services including job-finding workshops as appropriate.

Most UI claimants are required to complete an electronic profile for job matching purposes and attend an orientation with Employment Services staff. Only claimants attached to a closed union, in approved training (including apprenticeship programs), who commute while living out of state, or who do not have an expected date to return to work within four weeks (temporarily unemployed), do not have to complete these steps. The orientation includes a review of their electronic profile for completeness and provides an overview of services available to job seekers through WSO centers and partners.

Of those claimants, some are selected for a Reemployment Services and Eligibility Assessment (known as RESEA) as part of their orientation. Initial RESEA interviews are conducted in person by ES staff who are co–located with Workforce Innovation and Opportunity Act (WIOA) service providers. The RESEA includes an overview of UI eligibility requirements for remaining able, available and actively seeking work. It further provides more customized discussions with each claimant about "next steps" that could assist the person with becoming reemployed sooner as part of a basic reemployment plan.

Each RESEA includes an audit of the claimant's recent work search efforts for both detecting deficiencies (which are reported to UI Contact Center for review) and to aid the customer in determining ways to make his/her work search as successful as possible. Some of the claimants who complete the initial RESEA may be selected for one subsequent RESEA in order for additional work search review and personalized assistance with finding work. Second RESEA interviews are completed through a combination of in person meetings and telephone discussions.

## 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;

#### Wagner–Peyser Funds to Support UI Claimants

Through the filing of an initial Unemployment Insurance (UI) claim, customers initiate the process to become co–enrolled across core and partner programs available in the WSO centers. UI claimants in Oregon are required by law to complete registration with the state's employment service at one of the WSO centers within several weeks of filing the claim.

In Oregon, UI claimants are required by law to complete registration and attend an in-person orientation interview with Employment Services (ES) staff at one of the WSO centers. During the orientation and in subsequent meetings, UI claimants requiring assistance in seeking work receive the necessary guidance and counseling to ensure they make a meaningful and realistic work search from ES staff. ES staff also provide counseling, testing, occupational and labor market information, assessment, and referrals to employers for UI claimants and refer information to UI staff about UI claimants' ability or availability for work, or the suitability of work offered to them. Lastly, ES staff refer issues to UI staff for investigation when they identify people that may not be applying for suitable work when directed to, accepting offers of suitable work or actively seeking work, among other potential UI eligibility issues they may identify.

Oregon's UI program provides referrals to and application assistance for training and education programs with regard to the Training Unemployment Insurance (TUI) program and the Trade Readjustment Allowance (TRA) program. Eligible customers are referred to WSO center locations to help determine best matches for labor market, career goals, and educational institutions. Information about the programs is also provided to customers through public service announcements, press releases, recorded messages on call center phone lines, hard copy brochures, posters, mailers, digital displays, social media, and website messaging.

All unattached claimants filing an initial UI claim are notified by letter of the requirements to register with the state's labor–exchange system and meet with staff to complete enrollment activities, referred to as the Welcome Process, as a condition of benefit eligibility. Claimants have 14–days from notification date to complete the Welcome Process. At the time of notification, a flag is added to the individual's unemployment claim for the week in which enrollment activities must be completed. If a person attends timely, the flag is inactivated and no stop is placed on the claim. If the person fails to attend by the due week, that week, once claimed, will not be paid.

The agency, through specific federal funding, also conducts Reemployment Services and Eligibility Assessment (RESEA) interviews for claimants identified as most likely to exhaust benefits and UCX (military) claims. This initiative is an important element of the agency's strategy to help claimants become reemployed and address the issue of long-term unemployment. RESEA also helps to prevent and detect benefit overpayments. If selected for an initial RESEA, it is completed as part of their Welcome Process. RESEA claimants receive an overview of unemployment benefit eligibility and weekly work search requirements, which helps to avoid unintended overpayments during the course of their claim. Potential issues discovered that may affect the claimant's eligibility for benefits are referred to unemployment insurance for review. RESEA claimants are also provided a "work search advisory and reemployment plan" that identifies eligibility requirements and work seeking activities specific to each claimant, including one or more job search activities or "Next Steps" that are mutually agreed upon with staff.

RESEA claimants may be selected for a subsequent RESEA interview if they remain unemployed and continue to claim benefits. During this subsequent interview, staff review and update the claimant's work search advisory and reemployment plan, refer the claimant to appropriate resources and services, and assess the claimant's ongoing eligibility for unemployment benefits. Potential eligibility issues detected are referred to unemployment insurance for review.

# 2. Registration of UI claimants with the State's employment service if required by State law;

#### Registration of UI Claimants

Staff work with unattached claimants to gather additional information to ensure the registration is complete and reflects the type of work the claimant must seek as part of receiving unemployment benefits. A quality registration helps ensure the claimant is matched to suitable job listings by staff and employers using the state's labor–exchange system (iMatchSkills).

# 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

#### Administration of Work Test

As part of the agency's Work Test, claimants are notified of their rights and responsibilities when filing an initial claim for unemployment benefits, including a written notice of their monetary determination and work search expectations. Staff in WorkSource Oregon (WSO) centers are trained in issue detection and referral procedures. Staff are also trained how to address potential issues with claimants and help them identify solutions, including agency resources and services, to overcome potential barriers to receiving unemployment benefits.

# 4. Provision of referrals to and application assistance for training and education programs and resources.

#### Provision of Referrals

Claimants registering with WorkSource Oregon complete the state's common registration that is used to determine a customer's eligibility for both Title I and Title III programs and services under WIOA. During the initial "Welcome Conversation" (one-on-one meeting) with staff, referrals to training and education programs and WIOA resources are provided to claimants as relevant and appropriate to the individual's needs and career goals to include job finding workshops and networking activities, skills assessment activities, SNAP Employment and Training, and Adult and Dislocated programs. Staff also demonstrate how to access labor market information and career information to make informed choices. (Claimants are co-enrolled in Adult and Dislocated Worker programs when a qualifying Title I service is received.)

Many WorkSource Oregon centers have staff from various programs co–located onsite, so referrals are often a matter of a "warm hand–off" to a different staff person – and more offices are moving towards the co–located staff model described by WIOA and the WSO Operational Standards. Additionally, all physical locations feature electronic methods for referrals to partner programs and other organizations and resources.

# e. Agricultural Outreach Plan (AOP). Each State agency must develop an AOP every four years as part of the

Unified or Combined State Plan required under sections 102 or 103 of WIOA. The AOP must include an assessment of need. An assessment need describes the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

1. Assessment of Need. Provide an assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

Agricultural Outreach Plan (AOP)

#### Assessment of Need

Farm employers continue to note that there seem to be fewer U.S. workers to help with the harvest and are increasingly turning to the H–2A Temporary Agricultural Worker Program to meet the need for a stable workforce. Growers are concerned that various factors such as 1) the aging of the workforce, 2) a younger generation that chooses not to follow in their parents' paths, but instead pursue higher education, and 3) jobs in the manufacturing sector, food service, and construction opportunities may diminish the availability of agricultural workers. The cost of providing housing is prohibitive and the need for help in this area is acute.

Oregon's high minimum wage – one of the highest in the country – is one factor that could help retain or bring in more workers from other states. Another factor that could help attract workers is improvement of non-wage terms and conditions of employment. An alternative option for the future of Oregon's agricultural workforce is the growing use of the H–2A program, which allows agricultural employers to bring temporary workers from foreign countries to harvest the crops. Another option to meeting employer need for workers is the Agricultural Recruitment System (ARS), which involves recruiting workers in neighboring states. One of the requirements imposed by the alternative recruitment systems is the Adverse Effect Wage Rate, which is a higher wage rate that guarantees both domestic and foreign agricultural workers (performing the same work) a wage that is higher than the Oregon minimum wage, providing an incentive to workers in the agricultural system. These recruitment options also require employers to give hiring preference to domestic farmworkers. One of OED's longstanding goals has been and will continue to be connecting domestic MSFWs with agricultural employers as appropriate.

Technical assistance for outreach workers includes access to 1) Regional Technicians for just-in-time training, 2) Program Analysts for specific program questions, and 3) an outreach worker manual (created in 2019). Yearly training for outreach workers includes availability of training opportunities, partner collaboration (such as the National Farmworker Jobs Program, Title I, and local service providers), supportive service in the community, employment service Complaint System, and providing a summary of farmworker rights and conditions of employment.

Farmworker housing could be improved by broader use of available tax credits by employers. There are 330 registered camps that can house up to 10,000 individuals. Unfortunately, many agriculture employers are not aware of these tax credits to help them improve housing conditions for farmworkers

and their families. As a result, many migrant farmworkers continue to live in substandard housing. Oregon's migrant labor camp housing conditions include isolation, reduced access to services, 24hour eviction notice, and excess heat during peak months of harvest. To remedy this, MSFW housing in Oregon should undergo annual reviews by the Oregon Safety and Health Administration (OSHA) that take into account the promotion of tax credit funds to the agriculture employer base, and possibly more stringent housing inspection standards.

The unique workforce needs of MSFWs in Oregon are also addressed and provided by the Oregon Human Development Corporation (OHDC), operator of the National Farmworker Jobs Program (NFJP) under the WIOA section 167. OHDC has a presence in various counties in Oregon and coordinates with State Workforce Agency (SWA) outreach staff to conduct outreach to MSFWs through a Memorandum of Understanding (MOU) established in 2018. Outreach services are conducted in areas where MSFWs work, live and congregate.

The SWA will also promote NFJP career and training services to MSFWs registered in the SWA employment system. OHDC and NFJP staff will likewise promote services provided to MSFWs via the SWA system, and advise MSFWs on the Complaint System. The partnership will also require OHDC and NFJP staff to assist MSFWs in the completion of a full registration in the SWA's labor exchange system (iMatchSkills) to facilitate job matching, and the receipt of reemployment services for dual enrolled customers. OHDC provides NFJP career and training services in the following locations:

- OHDC Hood River, Wasco County;
- OHDC Woodburn, Marion/Polk/Yamhill Counties;
- OHDC Klamath Falls, Klamath/Lake Counties;
- OHDC Hermiston, Umatilla County;
- OHDC Ontario, Malheur County;
- OHDC Tigard, East Multnomah/Clackamas Counties;
- OHDC Hillsboro/Beaverton, Washington County;
- OHDC Affiliate Medford, Jackson/Josephine Counties;
- OHDC Affiliate Bend/Redmond/Madras, Jefferson/Deschutes/Crook Counties; and
- OHDC Affiliate North Coast, Lincoln/Tillamook/Clatsop Counties.

2. An assessment of the agricultural activity in the State means: 1) Identifying the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity; 2) Summarize the agricultural employers' needs in the State (i.e. are they predominantly hiring local or foreign workers, are they expressing that there is a scarcity in the agricultural workforce); and 3) Identifying any economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will affect agriculture in the State

Oregon cultivates over 225 unique crops each with a dynamic labor demand. Based on production value, the top labor-intensive crops in Oregon are: fruit crops (e.g. apples, cherries, and blueberries) grown primarily in the Columbia Gorge and Willamette Valley regions with labor demand peaking June to September; vegetable crops (e.g. onions, rhubarb, and sweet corn) grown primarily in

Northeast Oregon and the Willamette Valley regions with labor demand peaking July to October; greenhouse and nursery stock grown primarily in the Willamette Valley with labor demand peaking in March to September; Christmas trees grown primarily in the Willamette Valley with labor demand peaking in October to December; and hemp grown statewide with labor demand peaking in August to November.

Oregon, identified by the U.S. Department of Labor (USDOL) as being one of the 20 states with the highest estimated year-round MSFW activity, has assigned full-time, year-round staff to conduct outreach activities in those seven designated field office areas of the state. Two other field offices are in consideration to be designated significant areas in the coming Program Year as the demand for labor increases, specifically in the vineyard industry.

Agriculture continues to be one of Oregon's multi-million dollar industries and is a chief contributor to the Oregon economy. The top agricultural commodities in Oregon are wine grapes, pears, and hazelnuts. Other commodities are hay, wheat and potatoes. The geographical agricultural regions for these crops are eastern Oregon, the Columbia Gorge, southern Oregon, and the Willamette Valley. Tree fruits are harvested in July through December, and blueberries in July through August. Vegetables, such as onions and corn, are harvested from August through December. Greenhouse plants are grown and sold primarily from March through September, and Christmas trees are tended to and harvested from July through November.

Employers are having a hard time finding domestic workers who want to work in agriculture. To meet this demand, applications for the Foreign Labor Certification Program have increased significantly, from 47 in 2016, to 103 in 2019. Employers have requested to bring in upwards of 7,000 foreign workers since 2016.

Employers are also required to provide H2-A and corresponding workers with housing. The Oregon Occupational Safety and Health Administration (OSHA) will conduct the first consultation, and the State Workforce Agency (SWA) will conduct them in subsequent years. Housing consultations conducted by the OED have increased significantly in recent years, from five in 2016 and ten in 2017, to 64 in 2018 and 88 in 2019.

3. An assessment of the unique needs of farmworkers means summarizing Migrant and Seasonal Farm Worker (MSFW) characteristics (including if they are predominantly from certain countries, what language(s) they speak, the approximate number of MSFWs in the State during peak season and during low season, and whether they tend to be migrant, seasonal, or year-round farmworkers). This information must take into account data supplied by WIOA Section 167 National Farmworker Jobs Program (NFJP) grantees, other MSFW organizations, employer organizations, and State and/or Federal agency data sources such as the U.S. Department of Agriculture and the U.S. Department of Labor (DOL) Employment and Training Administration

The most recent and highly used enumeration study on the number of MSFWs in Oregon comes from Mallory Rahe, PHD, Oregon State University Extension Service. This study concludes that during the peak seasons, which includes reforestation under the Migrant Seasonal Protection Act, there are 60,000 seasonal workers and 30,000 migrant workers for a total of 90,000 MSFWs. While the migrant

stream is slowly diminishing, an additional 2,000 - 3,000 H2-A workers have started to replace that workforce on a seasonal basis. It's projected that this will continue to increase annually, in addition to the reforestation H2-B workforce based predominantly in southern Oregon. The Oregon Bureau of Labor and Industries (BOLI) manages the certification process of farm labor contractors, of which there are over 200 in the state.

Employers that provide good housing for their workforce often find their employees return the next season. Agricultural employers that have substandard housing for farmworkers are generally in a continuous struggle to find farmworkers to meet their harvest demands.

The most stable farmworker workforce in Oregon is the nursery industry. Oregon is one of the three top nursery producing states in the country and employs over 22,000 workers on a permanent/seasonal basis. Oregon's nursery industry also includes two of the state's top agricultural commodities, and is a driving force in the state's economy. Other top agricultural commodities in Oregon are the expanding vineyard industry, hops, blueberries, strawberries, apples, pears, cherries, grass-seed, onions, and hazelnuts.

While the predominant language of the Hispanic/Latino MSFW workforce is Spanish, a number of indigenous dialects such as Huichol, Mayan Yucatan, Mixteco-Nahuatl, Trique-Tarasco and Zapoteco can present challenges to the medical, education and employment fields.

Complaints from farmworkers include not being paid or paid incorrectly, safety conditions, inadequate housing issues, and sexual harassment and fear of retaliation by employers if they speak up about issues.

### 4. Outreach Activities

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

Please see narrative below.

# A. Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices

In Program Years 2020 to 2023, the Monitor Advocate will work with any and all groups to explore opportunities for strengthening partnerships to improve outreach. Outreach staff will continue to offer to speak at partners' staff meetings and provide them with up–to–date information about workforce services and commitments. The Monitor Advocate will engage in conducting outreach activities alongside outreach workers, and conduct presentations to partner agencies. MFSW representatives will conduct traditional one–on–one outreach to farmworkers. This aspect of outreach will focus on directly reaching migrant farmworkers, including those living in labor camps. Oregon also has a population of farmworkers who require information in indigenous languages to effectively learn about workforce services.

MSFW outreach staff and WSO field staff do not sufficiently update and promote H2-A job listings with higher paying wages to the local domestic workforce. To improve this, WorkSource Oregon (WSO) centers will ensure that those higher paying agricultural jobs are visible and accessible to walk-in customers. OED will also looks for new and creative ways to promote H2-A job listings to the local domestic workforce. MSFW representatives will also continue to serve as advocates of the Complaint System to ensure that MSFWs are aware of all of their legal protections.

OED staff will assist MSFWs in applying for and filling out employment applications for positions listed with WSO. Staff will also refer registered MSFWs to appropriate and relevant WIOA title I partner agencies and to the local area National Farmworker Jobs Program (NFJP).

OED is leveraging outreach activities with our Section 167 partner, Oregon Human Development Corporation (OHDC), local interest groups, and employer groups through employer and worker forums, and farmworker support groups.

The department's outreach goal for Program Year 2020 is to contact 30,000 MSFWs, and increase that number by 3% each Program Year through 2023. OED will look to reach an estimated 1,500 agricultural employers as the H2-A program continues to increase in Oregon. In Program Year 2018, SWA staff contacted 23,152 MSFWs.

Outreach staff have been provided training on the Agricultural Recruitment System (ARS) that includes regular agriculture listings and H2-A job listings. This training helps them work with employers, who increasingly need compliance education to navigate the H2-A application process which can be administratively complex.

The Monitor Advocate is active in conducting outreach activities, H2-A field visits, and field checks. Partner agency connections have been met with positive outcomes. Agencies that the SWA partners with to serve MSFWs and provide education and legal assistance include:

- National Farmworker Jobs Program;
- Community Colleges;
- College Assistance Migrant Program (CAMP);
- Statewide Migrant Head Start;
- Oregon Childhood Development Corp, MSFW State Childcare;
- Legal Aid for MSFWs;
- Oregon Law Center;
- Equal Employment Opportunity Commission;
- Oregon Bureau of Labor and Industries;
- U.S. Department of Labor, Wage and Hour;
- U.S. Department of Justice;
- Centro Cultural; and
- Portland Mexican Consulate.

B. Providing technical assistance to outreach staff. Technical assistance must include trainings, conferences, additional resources, and increased collaboration with other organizations on topics such as one-stop center services (i.e. availability of referrals to training, supportive services, and career services, as well as specific employment opportunities), the Employment Service and Employment-Related Law Complaint System ("Complaint System" described at 20 CFR 658 Subpart E), information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.

The OED will assign full-time MSFW representatives to appropriate locations in coordination with local leadership based on data supporting the needs of the area. OED is also conducting wage and

practice surveys to assess real-time agricultural working conditions to better determine requirements for H–2A job listings, and to help employers recruit workers.

To help MSFW outreach staff and frontline WSO staff identify MSFWs, the state labor-exchange system (iMatchSkills) displays an MSFW indicator in the job seeker's registration profile. Staff can also search for MSFWs using the MSFW indicator alone or in conjunction with other delimiters such as last contact date, local office of assignment, assigned staff, and services received by other programs such as SNAP Employment and Training.

While Oregon provides workforce services in each of its 39 WorkSource Oregon centers, primary outreach activities will be focused out of the designated seven significant offices: Hermiston, Ontario, Woodburn, The Dalles, Beaverton/Hillsboro, Salem, and Medford. Outreach focuses on marketing services and benefits, making the Complaint System available to farm workers through OED staff, educating training partners and other MSFW services providers.

OED will also educate agricultural employers about the responsibilities they have to workers, as well as the job placement services provided. Partner agencies that conduct outreach to MSFWs come into contact with an average of 10,000 MSFWs annually, per quarterly reports they provide to OED. In the next four years, OED staff will experience an increase of H2-A applications by agriculture employers. This will require more frequent field visits to those workers that will be working alongside Oregon domestic MSFWs.

The State Workforce Agency (SWA) signed a Memorandum of Understanding (MOU) with Oregon Human Development Corporation (OHDC)/National Farmworker Jobs Program (NFJP) in 2018 to facilitate MSFW registrations in the state's labor-exchange system (iMatchSkills) to increase access to reemployment and training services under WIOA. The MOU also provides NFJP staff access to job listings, the employer referral system, and wage data to help determine NFJP eligibility and provide enhanced services to MSFWs.

Technical assistance for outreach workers includes annual statewide training. This annual three-day training (conference) focuses on the availability of training opportunities for MSFWs, partner collaboration (such as the NFJP, Title I, and local service providers), supportive service in the community, employment service Complaint System, and providing a summary of farmworker rights, legal protections and conditions of employment. In the upcoming four year strategic plan, the SWA will collaborate closely with the Oregon Occupational Safety and Health Organization (OSHA), the Mexican Consulate, and the California State Monitor Advocate (through an MOU signed in Program Year 2018).

# 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

Presently, seven of Oregon's WorkSource Centers are designated as significant offices. A reevaluation will occur in 2020 to determine appropriate staffing to meet the needs of MSFWs across the state. The remainder of the field office MSFW outreach staff will conduct outreach activities as needed during their respective area's peak season. The OED is committed to exploring the ability of conducting outreach activities to reach hidden pockets of MSFWs that need to be informed of their legal protections, the Complaint System and the services available to them at any of Oregon's WorkSource Centers. The MSFW program is hampered by the inability to provide qualitatively equivalent and quantitatively proportionate services to MSFWs due, in part, to Wagner-Peyser funding levels which have remained relatively flat over time. Funding constraints limit the impact for all customers with significant barriers, in particular the underserved and hard to reach, MSFW population. Oregon's Workforce Innovation and Opportunity Act (WIOA) partners will be included in regional and local planning to ensure MSFW program customers are considered in their program service provisions.

WorkSource Oregon (WSO) staff work closely with the training resources available through the National Farmworker Jobs Program (NFJP). Other training resources specifically for migrant workers include, but are not limited to, Oregon State University College Assistance Migrant Program (CAMP), Chemeketa Community College – College Assistance Migrant Program, Portland Community College – College Assistance Migrant Leadership Institute, University of Oregon High School Equivalency Program (HEP), Chemeketa Community College High School Equivalency, High Desert Education Service District Program, and Portland Community College High School Equivalency Program (HEP).

Training for WSO staff includes how to provide a customized Reemployment Services and Eligibility Assessment (RESEA) program conversation, Unemployment Insurance (UI) connectivity, and recognizing UI eligibility issues, as well as core functions training. In calendar year 2019, 18 potential UI eligibility issues were detected for MSFW customers by WSO staff and referred to the UI division for review.

To facilitate communication between Employment Services (ES) and UI divisions and help strengthen partnerships for improved service delivery to shared customers (including MSFWs), WSO held a series of facilitated conversations around the state in 2019 with WSO staff (to include MSFW outreach staff) and UI center staff. Titled "WSO/UI Connectivity: Strengthening the Bond," these sessions allowed staff to build relationships, explore service delivery approaches, and share business practices with co-workers across divisions. These conversations were well received and WSO is planning follow-up sessions in 2020 to continue these conversations to further strengthen partnerships.

# 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

Oregon Employment Department (OED) technical staff train MSFW staff in the office as they come on board regarding the basics of Wagner-Peyser and WIOA. The Monitor Advocate provides training on the MSFW Complaint System, outreach services, the Monitor Advocate system, sexual harassment, and other programs and initiatives. They also receive training through the Foreign Labor Certification Program Coordinator on how to conduct Agricultural Labor Housing Consultations for employers who utilize the Agricultural Recruitment System (ARS) and the H2-A program. All MSFW staff are provided refresher training once a year at the MSFW representative annual training.

The following courses are either available to OED MSFW outreach staff at various times of the year or in development for release in 2020.

• Agricultural Outreach Workers Training Module

By the end of this module staff are able to: identify the purpose of outreach to MSFWs, describe the roles and responsibilities of an outreach worker, explain what an outreach "contact" is when working with MSFW, describe what kind of information is provided to MSFWs when conducting outreach, describe the role of an outreach worker when accepting a complaint from a MSFW while conducting outreach, and identify how to engage with employers in outreach activities.

• Facilitating Career Development

This course provides individuals with relevant skills and knowledge to assist others in planning careers and obtaining meaningful work. Staff receive in-depth training in the areas of career development in the form of 120+ class/instructional hours, provided by a nationally trained and qualified instructor using curriculum created by the National Career Development Association.

• A-COACH Approach Program

This program provides staff with the knowledge, skills, tools, and actions they need to develop a COACH Approach – a conversation style that is successful at building strong relationships, improving results, and helping people achieve their goals.

• SNAP Employment and Training Success Refresher

This course highlights and reinforces one of the main tenants of the SNAP E&T program: the Orientation and what information is to be shared with the customer along with how staff can perform the obligation.

RESEA Revisited

This course offers both a refresher of information as well as a deeper dive into key Reemployment Services and Eligibility Assessment (RESEA) concepts to include the initial RESEA Welcome Conversation and subsequent RESEA Conversation. Topics include developing a work search advisory and reemployment plan.

• Welcome Conversation e-learnings

These are a series of short e-learning modules available for all WorkSource Oregon staff to build skills related to the Welcome Conversation (one-on-one conversations with new and returning customers).

• Virtual New Staff Cohort

New staff from around the state participate in local office activities and virtual meetings to increase skill and understanding of OED philosophies, programs, and processes. The experience is coordinated by one trainer, and various trainers lead sessions that include subject-matter experts and program managers.

• Trauma Informed Care

This course is an effort to build internal knowledge and competency around Trauma Informed Practices.

• Motivational Interviewing

This course focuses on helping staff become a helper in a customer's change process and express acceptance of our customers, their experience, knowledge, and their solutions.

• WOMIS Basics

These are four 5-15 minute e-learning episodes to create a consistent WorkSource Oregon Management Information System (WOMIS) Basics learning experience that can be reflected upon for future use. This course covers registration for WOMIS for staff and customer sides, confidentiality, message errors, and labor-exchange (iMatchSkills) registration for staff and customer sides.

• Quality Feedback Measures Webinars

These webinars are designed for OED and WSO staff to understand the purpose of QFM, how it ties into the WSO Standards and the documentation that staff make in our customer information systems. Selected staff will have the opportunity to oversee the review process for their offices.

• MSFW Annual Training

An annual, statewide training for all staff involved in the MSFW program. Developed by and for staff in the program.

• MSFW Housing Consultation Training

Staff learn what forms to use and what to look for when certifying housing for employers who use the Agricultural Recruitment System and the H-2A program. Staff from the Oregon Safety and Health Administration also attend to provide guidance on the housing regulations in Oregon.

• Foreign Labor Certification Program Orientation

This orientation is required before staff can obtain the authority to refer on Foreign Labor Certification Program (FLC) job listings.

• MSFW Job Service Complaint System

The purpose of this training module is to provide staff a high level overview of the Job Service Complaint process with specific focus on how it relates to Migrant and Seasonal Farmworkers.

• Diversity Works

Diversity Works is a three-hour, interactive workshop that brings awareness of diversity and inclusion to the workplace.

• Culture Matters: Managing Unconscious Bias

This is a highly interactive half-day workshop designed to help individuals enhance their cultural awareness and understand the effect of unconscious bias on workplace performance. Practical strategies for improving performance when working across cultures will be given. Participants draw upon research-based findings to improve their self-awareness and to develop the first steps to relating and working with cultural intelligence.

# E. Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups

All OED field offices will collaborate with workforce partners and service providers to leverage training services for MSFWs. Partners will include Oregon Human Development Corporation (OHDC)/ National Farmworker Jobs Program (NFJP) grantee of Oregon. OED will also have an ongoing cooperative Memorandum of Understanding (MOU) with OHDC to provide access to the job seeker registration system, as well as connecting them to local office workforce planning. Other partners include WIOA Title I providers, universities, local community colleges, special programs funded to serve MSFWs, High School Equivalency Programs (HEP), community development farmworker housing associations, Centro Cultural, migrant health clinics, migrant education programs, Migrant Head Start, farmworker legal services, and other farmworker advocacy organizations.

# 5. Services provided to farmworkers and agricultural employers through the one-stop delivery system

Describe the State agency's proposed strategies for:

A. Providing the full range of employment and training services to the agricultural community, both farmworkers and agricultural employers, through the one-stop delivery system. This includes:

i. How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers

ii. How the State serves agricultural employers and how it intends to improve such services

MSFWs are recognized in WorkSource Oregon (WSO) centers as a targeted population group entitled to effective and equal access to the full range of workforce services. Federal regulations require that they receive workforce services on a quantitatively proportional and qualitatively equivalent basis as those provided to non–farmworkers. Using an integrated service delivery model (as outlined in the WSO Standards document), all customers will be offered a comprehensive menu in Spanish and English of skill enhancement products, including, but not limited to, occupational training. In addition, staff at WSO centers will use a variety of tools to attempt to match the job seekers' skills, interests and abilities with available high wage, high demand jobs in their current labor market area, or in other areas if desired. The integration of services with WIOA partners is intended to increase the quality of services, focus on skill and talent development of both unemployed and current workers and, on a system–wide basis, increase the wages, job retention and job advancement of Oregonians.

In addition to improved customer outcomes, more efficient and effective customer service is expected from the systematic coordination of federal workforce services. Finally, more efficient use of resources, and elimination of program duplication from enhanced integration are also expected to improve the use of limited and declining funding. Designated MSFW representatives within each workforce area will continue to work with local management and staff to keep focused on service delivery and equity outcome goals regarding MSFWs.

Customer outcomes will be measured by the federal MSFW performance measures (quantitatively proportionate services that include the following categories: Referred to Jobs, Provided Workforce Services, Referred to Support Services, Career Guidance, and Job Development); increased placements of MSFWs thru local Business Services Teams, which provide enhanced recruitment and referral services for employers in targeted sectors; increased numbers of MSFW registrations that are complete and current in the state's labor-exchange system, iMatchSkills; and finally, anecdotal evidence obtained through MSFW outreach staff and OHDC partner staff.

Training resources through the broader workforce system are also of interest to agricultural employers. They have identified that increased skills are needed for many agricultural opportunities, whether for supervisory positions or to meet the changing mechanization and technology requirements of the industry. WSO staff will work to increase placement results through more effective identification of skills that agricultural employers are seeking and identifying through their registrations in iMatchSkills.

Integrating WIOA and Wagner–Peyser services is an advantage to agricultural employers and their access to the workforce system. In particular, locally designed employer services teams will have responsibility for connecting local employers to WSO centers. To the extent agricultural employers connect with the workforce system individually or industry wide, job seekers will be better informed about available jobs, needed skills and training options related to agriculture, and the workforce system will be more informed about and responsive to the workforce needs of agriculture.

The most important Business Service WSO provides is connecting employers to qualified candidates. Business services are responsive to business and workforce needs of the local area, how these align with local sector strategies, and protocols to access recruitment processes and other services. All WSO centers will provide appropriate recruitment and other business services on behalf of employers (to include agricultural employers), including small employers, in the local area. Business services include: recruitment services, customized training, incumbent worker training, job postings, incentives, and rapid response.

Business services are continually evolving and improving. At the start of 2013, WorkSource Oregon began offering an enhanced business services model. Employers select this option when they want a deeper partnership with their business services staff member. To build a successful relationship, WSO staff begins by conducting on-site employer visits prior to the start of the recruitment, to better understand the business culture and the business recruitment needs, which allows staff to refer qualified candidates in a timely manner with an increased level of success. The employer then has a smaller, more highly qualified applicant pool, which saves them time and money.

This model has proven successful in building high-functioning business services teams, which serve as a single point of contact for businesses. In turn, this has helped improve communication and coordination of service delivery between workforce partners and allowed for more streamlined and targeted placement of WorkSource Oregon customers to include MSFWs, veterans, claimants, dislocated workers and other special populations. This model has also helped local areas align business services efforts and ensure that workforce investment activities meet the needs of businesses and support economic growth in each area. Enhanced communication, coordination and collaboration among businesses, economic development, service providers, business team members, and the local Boards will help leverage and align collective resources.

An example of helping connect MSFWs with employers is the work started in 2019 between the Monitor Advocate and the WSO Business Services Program Coordinator. Through this partnership, local Business Services Teams (operating in five of the state's nine workforce regions, with plans to expand to other regions in 2020) have increased collaboration with MSFW outreach staff to facilitate the referral of MSFWs to the Business Services Teams for enhanced job placement assistance. These teams develop relationships with businesses and work closely with them through the entire recruitment process. These teams also focus on filling job listings in the local sector strategy.

Activities that offices may pursue to facilitate increased successful labor exchange on all agricultural listings include handing out and collecting applications for work, scheduling interviews, and providing space at a specific field office for the employer's interviews. Staff may also assist workers with the actual application, help with translation at interviews when needed, and re-contact workers referred for an interview. This follow-up activity can produce more reliable recruitment results for the employer and the agency, helping to see that available workers are hired for needed employment. Staff will also use historical information on monthly employment patterns to identify opportunities for workers to effectively move from one local grower to another or be available for referral on any agricultural listing approved for recruitment of non–local workers.

OED will continue to promote membership on local and state workforce boards, and to meet key agricultural business owners and other business owners who see limited English proficient MSFWs and others as potential employees. This will help raise awareness of training needs within agriculture for MSFWs to reach higher levels of education, and may open new options for securing training funds from within and outside the workforce system.

# B. Marketing the employment service complaint system to farmworkers and other farmworker advocacy groups

MSFW outreach staff will also serve as an MSFW voice at the local level to raise any issues impacting MSFW customers as system integration moves forward through awareness of the Job Service Complaint System. Outreach includes information regarding the use of the Complaint System and follow up of complaints. All complaints are logged and reported to USDOL as provided in federal guidance. In addition, staff will provide MSFWs with information regarding worker rights through information sharing sessions and flyers.

# C. Marketing the Agricultural Recruitment System for U.S. Workers (ARS) to agricultural employers and how it intends to improve such publicity.

MSFWs will be encouraged to go to WorkSource Oregon (WSO) centers to receive the full services offered to all job seekers. MSFWs who are not fluent in English receive one-on-one interviews with staff for registration and job referrals. Staff that are not bilingual in the language of the job seeker are to seek interpreter services, including in indigenous languages, through the department's contracted interpreter service, or with the assistance of the coordinator of the Limited English Proficiency (LEP) program. Other MSFWs are to be offered assistance in registration to assure quality registrations are completed. Staff assistance is available to all MSFWs for learning the OED computer job match system and for using English and Spanish websites for looking at available jobs and learning about other workforce services. OED MSFW representatives will assist MSFWs in filling out applications for job listings registered in the OED system. The majority of MSFWs registered with OED, consistent with the overall farmworker population, require services to be provided in Spanish. Services and resources identified and promoted through the workforce system will include access to and referral of MSFWs to all WIOA service program providers, and specifically Oregon Human Development Corporation's National Farmworker Jobs Program (NFJP) in areas of the state in which they operate. Information about services from community partners, including food, clothing, housing, transportation, medical, social and legal assistance, will also be a continuing referral. With significantly increased concerns over an adequate labor supply for Oregon agriculture, WSO expects its labor exchange system will become a critical resource for agricultural employers.

MSFW outreach staff will continue to be trained on the Agricultural Recruitment System (ARS) by the Monitor Advocate and Foreign Labor Certification (FLC) Program Coordinator. Currently, outreach staff provide USDOL ARS brochures to employers when marketing services to agricultural employers. OED plans a special work session at the 2020 annual MSFW training that will focus on marketing the ARS and working with employers to identify alternative recruitment strategies.

### 6. Other Requirements

### A. Collaboration

Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

All OED field offices will collaborate with workforce partners and service providers to leverage training services for MSFWs. Partners will include Oregon Human Development Corporation (OHDC)/National Farmworker Jobs Program (NFJP) grantee of Oregon. OED will also have an ongoing cooperative Memorandum of Understanding (MOU) with OHDC to provide access to the job seeker registration system as well as connecting them to local office workforce planning. Other partners include WIOA Title I providers, universities, local community colleges, special programs funded to serve MSFWs, HEP language classes, community development non–profit farmworker housing associations, Centro Cultural, migrant health clinics, migrant education programs, Migrant Head Start, farmworker legal services, and other farmworker advocacy organizations.

WorkSource Oregon (WSO) signed a four-year MOU with OHDC/NFJP in 2018. NFJP providers train alongside WSO staff in yearly training events and are increasing interactions in referrals. NFJP management will continue to share knowledge of their program to local WSO offices. NFJP staff have gained access to the state's labor-exchange system (iMatchSkills) to register customers for workforce services, provide referrals to job listings, and track services provided to MSFWs.

Oregon's WIOA partners will be included in regional and local planning to ensure MSFW program customers are considered in their program service provisions. WSO staff currently work closely with the training resources available through the National Farmworkers Jobs Program. Other training resources especially for migrant workers include Oregon State University College Assistance Migrant Program (CAMP), Chemeketa Community College-College Assistance Migrant Program, Portland Community College-College Assistance Migrant Program, Oregon Migrant Leadership Institute, University of Oregon High School Equivalency Program (HEP), Chemeketa Community College High School Equivalency Program (HEP), and the High Desert Education Service District.

While MSFWs are recognized as a targeted population and receive equitable workforce services at the State Workforce Agency (SWA), integration of the WIOA Title I services for MSFWS is unresponsive. As more H2-A job listings come into Oregon, more domestic MSFWs are being displaced and Title I employment and training services could benefit many of these impacted workers. To facilitate this connection, promoting and referring domestic MSFWs to WIOA Title I providers will be encouraged at all local WorkSource Oregon centers.

Improving access to and enrollment of MSFW customers with Title I employment and training services is a priority for the Monitor Advocate in Program Years 2020-2023. One opportunity to improve this connection is for OED management to meet with state workforce boards and WIOA Title I providers to address how to provide services to both domestic MSFWs and agricultural business owners who see MSFWs as potential employees. An awareness of the rights and services that MSFWs should receive under WIOA Title I needs to be explored, discussed and a recruitment process implemented.

#### B. Review and Public Comment

In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP.

The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

The state's NJFP grantee, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations were given an opportunity to comment on the AOP. Below is the list of organizations from which feedback and suggestions were solicited. Also included are comments received and our responses to those comments.

- Columbia Gorge Growers Shippers, Executive Director
- Legal Aid Services of Oregon, Attorney
- Oregon Association of Nurseries, Wilsonville Executive Director
- Oregon Bureau of Labor and Industries, Compliance Manager
- Oregon Department of Agriculture, Special Assistant to the Director
- Oregon Farm Bureau, Executive Vice President
- Oregon Human Development Corporation, Executive Director
- Oregon Law Center, Farmworker Office, Managing Attorney
- Pineros y Campesinos Unidos del Noroeste, Executive Director
- State of Oregon Governor's Office, Affirmative Action Manager
- US Department of Labor, Wage and Hour Division, Portland District Office
- US Department of Labor, Wage and Hour Division, Community Outreach Specialist

# The following comments were received from Legal Aid Services of Oregon (LASO) and Oregon Law Center (OLC), Farmworker Office. Our comments are in italics.

#### 1. Assessment of Need

We are troubled that you lead the assessment of need with a statement that employers note that there are fewer U.S. workers and are turning to the H-2A program. Later, the plan notes that there are about 90,000 agricultural workers in the state of Oregon and that only several 1000 of them are H-2A workers each year. Thus, while there may be an increasing number of H-2A job orders, the number of H-2A workers is quite small compared to the number of agricultural workers in Oregon

(60,000 of the 90,000 are seasonal workers). We suggest you lead your plan highlighting that the Oregon Employment Department's work is to connect these 90,000 workers who want to keep working in Oregon with the agricultural employers who need them, and who by law are required to hire them in preference to H-2A workers.

<u>OED Response</u>: Thank you for the suggestion. Instead of changing the lead to our plan, OED will incorporate language emphasizing that one of our longstanding goals has been and will continue to be connecting domestic MSFWs with agricultural employers as appropriate.

Your first paragraph concludes with an assessment of how compliance with state and federal laws adds paperwork and cost. We ask that the plan recognize that state and federal laws were enacted by our elected leaders to meet important goals, namely protecting the rights of workers. Many agricultural employers are successfully running businesses and complying with the laws. This plan should support those employers and support workers' access to their rights. Tacit agreement with complaints about compliance undermine OED's critical role in ensuring that program requirements are met and the laws are followed.

## <u>OED Response</u>: Thank you for the feedback. OED will remove the statement about compliance with state and federal laws adding paperwork and cost.

We support your recognition that Oregon's minimum wage and the higher AEWR may be factors in attracting workers. We suggest that the department include in its assessment that employers' improvement of other non-wage terms and conditions of employment can help to retain or bring in more workers. These non-wage terms could healthy workplaces, healthy pacing of work, quality lunch/break rooms, positive supervision, etc. OED should also give specific recognition and support to our aging agricultural workforce and the important role that female farmworkers play in the success of Oregon agriculture.

<u>OED Response</u>: Thank you for the feedback. OED will add improvement of non-wage terms and conditions as a factor that could help attract workers. OED's role is to provide equitable support to all those seeking our assistance. OED recognizes and appreciates the contributions of all those who have played a role in the success of Oregon agriculture. However, OED does not believe the purpose of the AOP is to recognize specific groups of individuals for their contributions.

We support the recognition that quality housing is key to attracting and retaining workers. We support your request for annual OSHA inspections and "more stringent housing inspection standards." (p. 2)

OED Response: OED thanks LASO and OLC for agreeing with us and appreciates the support.

#### A. AN ASSESSMENT OF THE AGRICULTURAL ACTIVITY IN THE STATE

In this section, it is not clear what are the top five labor-intensive crops (as requested by the instructions), when these crops have heavy activity nor what that activity is, nor what are the specific geographic areas of those top five-labor intensive crops. This information is critical for the Employment Department staff to take the steps to develop and implement a plan to match employers with employees. The general assertions made are insufficient to guide a meaningful plan. For example, some of the listed crops, like hazelnuts, may be a top commodity but are not in the top five labor-intensive crops. We request that a more detailed assessment of the need be included in this section of what type, when and where is agricultural labor needed.

This part of the plan does not include Farm Labor Contractors, employers who hire thousands of workers to perform agricultural work in Oregon. We ask you to recognize the important role that licensed contractors play in supplying labor at times of critical need and include their perspectives in the plan.

<u>OED Response</u>: Thank you for the feedback on the top-five labor-intensive crops. OED agrees with your assessment and will update the top-five labor-intensive crops list to include the months and specific geographic regions of heavy activity.

As mentioned earlier, OED recognizes and appreciates the contributions of all those who have played a role in the success of Oregon agriculture. However, OED believes recognizing individuals for their contributions to the agricultural industry is not in scope for the AOP.

### B. AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS

Again, we are concerned that you follow the paragraph describing the 90,000 domestic agricultural workers, with a focus on the "increase" of H-2A workers. We ask the Employment Department to maintain its focus on connecting agricultural employers with domestic workers.

We appreciate your recognition of the need to serve agricultural workers who speak Spanish and those who speak indigenous languages from Mexico. We also ask the department to recognize the growing and diverse communities of workers from Guatemala. We ask that the plan include specific steps as to how to reach these communities and in particular how to provide meaningful services in languages other than English and Spanish and to those who have limited literacy and computer skills.

<u>OED Response</u>: As stated earlier, OED will incorporate language emphasizing that one of our longstanding goals has been and will continue to be connecting domestic MSFWs with agricultural employers as appropriate.

Thank you for the suggestion to recognize the growing and diverse communities of workers from Guatemala. OED will communicate this important need to outreach staff and work to promote services to this community. However, OED believes adding language about outreach to a specific group of workers is out of scope for the AOP. Please know that OED is committed to outreach activities to locate and contact as many MSFWs as possible not reached by normal intake/registration activities in local WorkSource Oregon centers.

#### 2. Outreach activities

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

This is a critical section. We appreciate your recognition that "MSFW outreach staff and WSO field staff do not sufficiently update and promote H-2A job listings with higher paying wages to the local domestic workforce." (p. 4) We ask you to include specific steps that staff will take to communicate H-2A job listings to the domestic workforce with specific performance measures. These steps might include radio shows, job fairs, including specific H-2A job listings when MSFW outreach staff do community presentations and outreach events, consistently creating easy-to-read attractive flyers within a short time frame and distributing to key organizations and community locations (like laundromats and local stores). Please include specific steps about how will you connect with indigenous language speaking communities - will you hire staff who speak indigenous languages, tape radio spots in those languages, etc.

<u>OED Response</u>: OED appreciates the suggestions for promoting H2-A job listings to domestic workers and will take those into consideration for implementation. OED will add language to the AOP to reflect this important activity and the need to look at alternative ways to promote H2-A job listings to the local domestic workforce. OED has and will continue to promote H2-A job listings by posting them in our one-stop centers so they are visible to MSFWs and others to consider. OED also appreciates the suggestions for connecting with indigenous language speaking communities and will take those into consideration for outreach staff.

We support your recognition of the importance of "one-to-one" outreach. We ask that MSFW staff be given the time outside of the office to make these connections happen. We ask the Employment Department to track MSFW staff time to ensure that sufficient time is spent outside of the office, in the field. We ask you to set specific performance measures as to the amount of time for MSFWs to spend in the field conducting outreach to domestic agricultural workers, as required by the Wagner-Peyser Act and regulations.

<u>OED Response</u>: Each of our seven significant MSFW offices have full-time, dedicated, staff responsible for MSFW outreach efforts. Non-significant offices also have dedicated staff as needed

during peak seasons to perform outreach work. Local office management in coordination with the State Monitor Advocate are responsible for ensuring outreach staff perform their duties as required under federal guidelines and local outreach plans. At this time, OED believes current oversight is sufficient and that implementing performance measures for staff is an unnecessary administrative burden for the department at this time.

We applaud the Monitor Advocate for his "vigorous outreach." His presence in the many agricultural worker communities is well-known. We also thank the MSFW staff for their efforts. It is important that OED acknowledge and support the valuable contributions to OED's mission that the Monitor Advocate and MSFW workers make.

## <u>OED Response</u>: OED appreciates LASO's and OLC's recognition of the State Monitor Advocate's work and the contributions of MSFW staff in serving the MSFW community.

Each region is different. We suggest that the plan include details about the specific efforts the significant offices will take to contact farmworkers not reached through normal intake activities.

<u>OED Response</u>: Thank you for the suggestion. Please know that each significant office works with the State Monitor Advocate to prepare an annual outreach plan describing specific outreach steps to contact MSFWs in their community. OED believes that providing this level of detail for significant offices is outside the scope of the AOP.

#### B. PROVIDING TECHNICAL ASSISTANCE TO OUTREACH WORKERS.

We appreciate that this section starts with assertion that OED is conducting wage and practice surveys to help determine actual working conditions. (p. 5) We ask OED to complete the survey such that prevailing practices can be established. Not only did the 2016 plan include a plan to conduct a survey, as you know, Oregon has gone for many years without prevailing practice survey results. We ask OED to commit the resources necessary to complete this. We ask that the plan include a date by which such survey will be completed. We ask that regular completion of these surveys continue as required by law and that they be used to evaluate job openings. In the absence of completed and validated surveys, we ask that OED use its staff expertise and other information to make informal determinations of actual prevailing practices in the agricultural areas.

<u>OED Response</u>: OED is committed to conducting and completing a wage and prevailing practices survey. We have the necessary resources to put a survey together and disperse it. We will attempt to obtain responses from agricultural employers in Oregon as best we can. In absence of a finding from the responses we receive, we will conduct ad-hoc surveys and request guidance from expert staff. OED is not prepared at this time to include a survey completion plan.

We support the need to adequately complete MSFW registrations. We note that this includes training all WorkSource Oregon staff who may greet agricultural workers coming into the office. This training should include respectful and culturally appropriate ways to determine whether a worker has the requisite skills to use the computer system. Our clients often tell us that they are just pointed to a computer when they do not know how to use one or have the skills to learn how to use one. OED staff should complete the MSFW registrations when agricultural workers are unable to do so themselves.

<u>OED Response</u>: Thank you for providing this feedback. OED is committed to ensuring future MSFW training sessions incorporate respectful and culturally appropriate ways for staff to determine whether MSFWSs have the requisite skills to use our computer systems.

We support the need for increased field visits. (p. 6) We suggest that the plan include additional training on what steps to take during field visits, including adequate record keeping of data collected during such field visits. Documenting the work experiences of MSFWs during field check interviews is essential to ensuring that employers adhere to the requirements of the law.

<u>OED Response</u>: OED appreciates this suggestion but believes this level of detail is beyond the scope of AOP. Please know that OED has developed new documents for staff to capture field visit data. These documents outline steps to take during field visits and include sections for recording specific

field data and other relevant information. These documents will be shared with staff at the upcoming MSFW training conference and in future training sessions.

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.

We support the need for increased funding and other resources to support MSFWs. Staff time spent in the field connecting with agricultural workers one-on-one in safe, community locations is key to meaningfully reaching many workers. We note that while it is important for field work to include outreach to H-2A workers, sometimes that work is easier because the H-2A workers are easier to be found. It is critical that field work include the difficult work of finding and connecting with domestic agricultural workers in their communities.

<u>OED Response</u>: Thank you for your support. OED agrees that is critical to find and connect with domestic agricultural workers to provide labor-exchange and other needed services. This has been and will continue to be a focus of the MSFW program.

We continue to be concerned that many agricultural workers face barriers in accessing unemployment benefits. Many workers do not understand the telephone system or how to report correctly. Language barriers often cause misunderstandings that lead to allegations of overpayments causing those workers to avoid applying for benefits in the future even when they are eligible because they are afraid. We suggest that the department conduct focus groups with agricultural workers who use the UI system or have used it in the past but have ceased using it to obtain further insight on how to reduce barriers to accessing these important benefits. We suggest that the plan include training for UI staff on agricultural worker issues such as transportation, raiteros, contract work, usual work searches, etc.

<u>OED Response</u>: OED appreciates this feedback and will share your concerns and suggestions with UI management.

D. PROVIDING STATE MERIT STAFF OUTREACH WORKERS PROFESSIONAL DEVELOPMENT ACTIVITIES

We suggest that the "Agricultural Outreach Workers Training Module" also include cultural competency training specifically regarding working with farmworkers and their different communities.

<u>OED Response</u>: OED agrees and is developing a cultural competency training for the OED training team so they can better assist and relate to MSFW outreach staff.

3. SERVICES PROVIDED TO FARMWORKERS AND AGRICULTURAL EMPLOYERS THROUGH ONE-STOP DELIVERY SYSTEM.

A) PROVIDING THE FULL RANGE OF EMPLOYMENT AND TRAINING SERVICES TO THE AGRICULTURAL COMMUNITY

This section of the plan was difficult to understand because many assertions were vague and did not include specific steps that staff will take to insure that agricultural workers receive workforce services equitably. For example, "[i]n addition to improved customer outcomes, more efficient and effective customer service is expected from the systemic coordination of federal workforce services." (p. 10). The plan fails to list what are the "customer outcomes" desired, nor how more efficient and effective customer service will be measured. It is unclear exactly how federal workforce services will be coordinated. Effectively serving MSFWs requires additional effort that might run counter to vague concepts of "efficiency."

<u>OED Response</u>: Customer outcomes will be measured by the federal MSFW performance measures (quantitatively proportionate services that include the following categories: Referred to Jobs, Provided Workforce Services, Referred to Support Services, Career Guidance, and Job Development); increased placements of MSFWs thru local Business Services Teams, which provide enhanced recruitment and referral services for employers in targeted sectors; increased numbers of MSFW

registrations that are complete and current in the state's labor-exchange system, iMatchSkills; and finally, anecdotal evidence obtained through MSFW outreach staff and OHDC partner staff. This language will be added to the AOP.

As for coordination of federal workforce services, the plan mentions, in numerous places, coordination with OHDC to mutually serve a common customer and collaborate outreach efforts. The plan also identifies the need to enhance ties with Title 1 providers for serving MSFW customers. OED is also a SNAP Employment and Training provider (a program launched in 2017). This program is offered in all WorkSource Centers across the state and made available to eligible MSFWs as part of WorkSource Oregon's "Welcome Conversation" for new and returning customers. Services offered through SNAP E&T include enhanced job placement assistance, support services to include assistance with transportation, tools, and other work related expenses, and funding for training. Staff are also trained to assess and refer customers to other WIOA partner programs as relevant and necessary.

We understand that improved registrations is necessary to this system working. Please describe in the plan what the department understands to be the current barriers to adequately obtaining MSFW registrations and what strategies it will employ to work to overcome those barriers. Please state what are the department's goals - how many new MSFW registrations will be completed each year for each significant office.

<u>OED Response</u>: Thank you for the suggestions to update the AOP. Improving the quality of MSFW registrations will be a key initiative for the department in the coming years. Training is currently being developed to assist staff in working with MSFW customers to develop qualify registrations to improve job matching and service delivery efforts. In developing this training, OED will also learn more about current barriers to serving MSFWs and obtaining quality registrations. Please know that this training is being developed by OED's Workforce Operations training unit. This unit is staffed with dedicated, full-time trainers that specialize in all aspects of training development and delivery. These individuals work closely with subject matter experts and other technicians to develop customized training for staff. And finally, the department is working to develop strategies to monitor and measure quality registrations.

In regards to stating the department's goals with respect to the number of MSW registrations that will be completed each year, OED believes listing this is outside the scope of the AOP and furthermore, trying to predict the number of registration per office would be difficult.

Please share what are the steps by which "locally designed employer services teams" will connect local employers with domestic agricultural workers. Please explain how "local Business Services Teams" will help enhance "job placement assistance" for agricultural workers. Those steps are not clearly listed in the plan.

<u>OED Response</u>: Comprehensive Business Services are offered through WSO centers to ensure that WSO is providing a value-added service to businesses and is supporting local sector strategies and investment priorities. Staff working in these roles are referred to as "employer services teams." The most important Business Service WSO provides is connecting employers to qualified candidates. Business services are responsive to business and workforce needs of the local area, how these align with local sector strategies, and protocols to access recruitment processes and other services. All WSO centers will provide appropriate recruitment and other business services on behalf of employers (to include agricultural employers), including small employers, in the local area. Business services include: recruitment services, customized training, incumbent worker training, job postings, incentives, and rapid response.

Business services are continually evolving and improving. At the start of 2013, WorkSource Oregon began offering an enhanced business services model. Employers select this option when they want a deeper partnership with their business services staff member. To build a successful relationship, WSO staff begins by conducting on-site employer visits prior to the start of the recruitment, to better understand the business culture and the business recruitment needs, which allows staff to refer qualified candidates in a timely manner with an increased level of success. The employer then has a smaller, more highly qualified applicant pool, which saves them time and money. This model has proven successful in building high-functioning business services teams, which serve as a single point of contact for businesses. In turn, this has helped improve communication and coordination of service delivery between workforce partners and allowed for more streamlined and targeted placement of WorkSource Oregon customers to include MSFWs, veterans, claimants, dislocated workers and other special populations. This model has also helped local areas align business services efforts and ensure that workforce investment activities meet the needs of businesses and support economic growth in each area. Enhanced communication, coordination and collaboration among businesses, economic development, service providers, business team members, and the local Boards will help leverage and align collective resources.

OED's business services teams are currently working with the OED's Business Services Coordinator and MSFW outreach staff to facilitate the referral of MSFWs to Business Services teams for job matching and placement services.

We support the plan's listing of activities to help support labor exchange for agricultural workers. We ask that the plan emphasize the critical step of MSFW staff following up and contacting workers referred to jobs to determine what happened. If the worker was not offered the job, MSFW staff should inquire further as to what occurred, record that information and determine if further assistance is needed. Use of the Job Service Complaint System is essential to ensuring that MSFWs receive the services they need from OED and the jobs they deserve from agricultural employers.

<u>OED Response</u>: Thank you for this suggestion. OED's current business model supports follow-up with MSFWs after referral. We will continue to train to this and look for ways to improve follow-up activities. OED does not believe the plan needs to emphasize the importance of follow-up activities.

We support the activity listed as "[s]taff will also use historical information on monthly employment patterns to identify employment opportunities for workers to effectively move from one local grower to another or be available for referral on any agricultural listing approved for recruitment of non-local workers." (p. 10) We ask that the plan include a specific goal of where this will occur and by which date annually will such an assessment be made. We ask further that the plan specify how this information will be communicated to employers and workers.

<u>OED Response</u>: Thank you for this feedback, OED will take these suggestions into consideration. OED is not prepared to discuss any potential goals related to employment assessments at this time.

We support that OED will promote the inclusion of agricultural workers on local and state workforce boards. (p. 11) We also support that the training needs of agricultural workers be assessed by these boards and that training resources be equitably allocated to this group of low-income workers.

<u>OED Response</u>: OED appreciates this feedback and thanks LASO and OLC for their continued support of our efforts in these critical areas.

C. MARKETING THE AGRICULTURAL RECRUITMENT SYSTEM TO AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH PUBLICITY.

We appreciate that "WSO expects its labor exchange system will become a critical resource for agricultural employers." (p. 11) However, the labor exchange system has to be publicized to employers in a targeted manner. We ask that the plan include an assessment of those employers most likely to benefits from the system and the timing when the employers are most likely to benefit from use of the system. OED could require employers to utilize the system before it determines that there are insufficient domestic workers available as needed to approve H-2A job orders.

<u>OED Response</u>: Thank you for these suggestions. OED agrees that a more sophisticated mechanism or model to identify and target employers most likely to benefit from using the system would be helpful. This need will be taken into account as the department moves toward modernizing its labor-exchange system.

4. OTHER REQUIREMENTS

### (A) COLLABORATION

We appreciate your concerned recognition that "[w]hile MSFWs are recognized as a targeted population and receive equitable workforce services at the State Workforce Agency (SWA), integration of the WIOA Title I services for MSFWs is unresponsive" and that "[a]s more H-2A job listings come into Oregon, more domestic MSFWs are being displaced." (p. 12) Both of these situations are not only undesirable but also potentially unlawful. We ask that the plan include specific steps as to how Title I services will be integrated and how to prevent domestic MSFWs from being displaced. We ask that the plan include specific goals as to how many MSFWs will be referred to WIOA Title I providers and that follow up be done to check on the status of those referrals.

<u>OED Response</u>: OED does not believe it necessary to develop goals on MSFWS referred to and served by Title 1. Instead, OED will be working with our Title 1 partners on ways to improve integration of service delivery to MSFWs. Specific steps to improved integration will be identified as conversations with partners occur, areas for integration are identified, and service delivery models are developed.

### (C) DATA ASSESSMENT

We understand that the "WSO has fallen short of providing qualitatively equivalent and quantitatively proportionate services to MSFWs in comparison to services provided to non-MSFWs in the areas of Total Staff Hires, Staff Hires at Greater than Minimum Wage, and Staff Non-Agricultural hires." We ask you to clarify what are the department's goals in these areas for the next four years. Please give additional information on what does it mean to "focus on addressing the needs of the agriculture employer base to improve the hiring of Total Active MSFW applicants." How will the department increase outreach - what are your outreach goals? How many MSFWs will be referred to NFJP?

<u>OED Response</u>: OED does not have specific goals for these measures (Total Staff Hires, Staff Hires at Greater than Minimum Wage, and Staff Non-Agricultural hires), but will take this into consideration. To improve outcomes, OED's regional business services teams will be working closely with outreach staff to help place MSFWs with employers posting with WorkSource. By focusing on addressing the needs of the agriculture employer base to improve the hiring of Total Active MSFW applicants, OED means it will enhance outreach to agricultural employers to better understand their hiring needs (this will be done in coordination with our business services teams as discussed above in a prior section). This outreach will be conducted by outreach staff and members of our business services teams. OED will identify agricultural employers through the iMatchSkills database of employers and by using employer data from our research unit and other venues. Outreach will be conducted using a variety of methods as appropriate to include in-person visits, phone calls, email, and attending community events such as the Chamber of Commerce meetings. OED has not established any outreach goals in terms of numbers, but will take this suggestion into consideration. And finally, OED has not identified the need to develop a goal of MSFWs referred to NFJP, but will also take this into consideration.

We ask that the plan include not approving job orders that are not in compliance and for which there are sufficient domestic workers. We ask the plan include steps that the department will determine whether there are sufficient domestic workers before approving job orders. We ask that the plan include that outreach to domestic MSFWs includes publicizing specific H-2A job orders. We ask that the plan include how many job fairs will be held in each significant office for H-2A jobs. We ask that the plan include whether follow up will be conducted to MSFWs referred to H-2A jobs. As you state in the following section, "[s]imple follow ups with MSFW clients, H-2A job listing promotion and advertisings, job fairs for MSFWs, updated and complete MSFW registrations in the state's labor exchange system, and communication with agriculture employers regarding domestic MSFW referrals would significantly improve outcomes if implemented and managed through the SWA." (p. 15) We agree! We ask that the plan include performance measures goals for each significant office and specific steps as to how these goals will be reached.

<u>OED Response</u>: In regard to not approving job orders that are not in compliance and for which there are sufficient domestic workers, please know that OED follows federal guidelines in the review and approval of H-2A job orders. We do believe this needs to be called out in the AOP.

In regard to the plan including steps that the department will determine whether there are sufficient domestic workers before approving job orders, please know that this is something that OED will look into and is open to further discussions with LASO and OLC on a process for moving forward. As for including this in the plan, we believe that such steps are beyond the scope and intent of the AOP.

In regard to asking for the plan to include that outreach to domestic MSFWs includes publicizing specific H-2A job orders, please know that OED publicizes H-2A job orders through iMatchSkills and posts them in WSO Centers. OED is also exploring ways for outreach staff to distribute flyers about job orders thru community events and regular staff outreach activities. OED is open to other methods of promoting H-2A job orders to domestic MSFW's and will continue to explore ways to promote these listings to domestic MSFWs. OED will add a statement to the plan reflecting these additional outreach activities.

In regard to the plan including how many job fairs will be held in each significant office for H-2A jobs, please know that job fairs for H-2A job orders will be held on an as-needed basis in local WSO Centers. As such, a specific number of job fairs cannot be provided in the AOP.

In regard to asking that the plan include whether follow up will be conducted to MSFWs referred to H-2A jobs, OED agrees. OED does mention following-up with MSFWS but will modify the language to clarify that this is in relation to job referrals.

In regard to having the plan include performance measures goals for each significant office and specific steps as to how these goals will be reached, we thank you for the suggestion. However, OED believes adding goals for each office is beyond the scope of the AOP. OED is open to a dialogue with LASO and OLC regarding performance measures for individual offices.

### (D) ASSESSMENT OF PROGRESS

We appreciate your assessment. We appreciate the work of many of your department's staff that are working to make this work. We ask for broader support from the department, especially WorkSource Oregon directors and staff, to make this work a priority, to create specific action plans and to hold offices accountable to accomplish the steps listed in the plans.

Thank you for giving us this opportunity to provide some comments about your plan. We look forward to continuing to work with you and your staff to help improve services and equitable access to resources for domestic workers.

<u>OED Response</u>: OED would like to thank LASO and OLC for their thorough and thoughtful review of our AOP and providing valuable feedback and suggestions on ways to hold the MSFW program accountable, improve service delivery to the MSFW community, and further strengthen OED partnerships with service providers. OED looks forwards to working with LASO and OLC to ensure MSFW customers have equitable access to services and are served in a manner that is qualitatively equivalent and quantitatively proportionate to the services provided to all other job seekers.

## The following comments were received from Oregon Human Development Corporation (OHDC). Our comments are in italics.

### I. AOP Section 1 – Assessment of Need: Page 2, 2nd paragraph includes the statement:

The MOU is subject to change and re-evaluation if OHDC fails to collaborate.

<u>OHDC Comments</u>: "OHDC objects to this language – the Memorandum of Understanding between OED and OHDC is subject to change and is re-evaluated from either party. Collaboration is not a one-way street. This sentence implies that OED is the arbiter of the level of cooperation/collaboration of this relationship. Please strike this sentence."

OED Response: OED agrees with OHDC and will strike the sentence.

### II. AOP Section 1 – Assessment of Need: Page 2, 3rd paragraph states:

Below is a list by activity and services category showing the number of farmworkers OHDC proposed to serve in Program Year 2019 under the NFJP. MSFWs may be eligible to receive these services under NFJP when referred to OHDC by WorkSource Oregon (WSO) staff and partner programs. WSO staff, particularly MSFW representatives, work in concert with NFJP staff to promote these services to farmworkers.

<u>OHDC Comments</u>: "There (is) no value to the intended audiences on the exact numbers OHDC proposes to serve and or expected categories. Please remove numerical values from activities and strike those service activities.

Below is a suggested rewrite of this paragraph and subsequent activities.

Below is a list of WIOA based services that are made available via the Oregon workforce development system. We acknowledge while there is a dedicated Career/Training Farmworker service provider in OHDC via the National Farmworker jobs Program, it is upon the workforce system as a whole to ensure that equitable services are accessible to farmworkers across the state.

Therefore, the following menu of services is made available for referrals from WSO staff to OHDC NFJP offices for farmworkers. The referrals made by WSOD should not include those services that can be delivered via current WSOD MSFW and or OED staff.

Career Services:

- Basic Career Services
  - o Registration into state job search system
  - o Eligibility determination for the NFJP program
  - Initial assessment of skill levels including literacy and English proficiency, and support service needs
  - Job search assistance and placement
- Individualized Career Services
  - Funded Work Experience opportunities
  - Career Planning
  - o Development of Individualized Employment Plans
  - Short term pre-vocational classes (Ethics in the workplace, teamwork, problemsolving, working in U.S. culture)
  - Job Readiness classes
  - English language acquisition classes and access to ESL software
- Follow-up Services
  - Counseling on workplace integration and success
  - 12 months of follow-on services to ensure successful placement after exiting from program services
- Training Services
  - Occupational skills training
  - On-the-job training opportunities
  - o Training programs offered by the private sector

o Other training opportunities as allowed by WIOA"

<u>OED Response</u>: OED agrees with OHDC's comments and will strike this section. OED does not agree to the suggested rewrite which essentially lists mandatory WIOA services available through WorkSource Oregon. The proposed strategies for providing services to farmworkers is covered in the AOP in Section 3, Services Provided to Farmworkers and Agricultural Employers through the One-Step Delivery System. In this section OED describes the services that will be provided to farmworkers through an integrated service delivery model such as skill enhancement products, occupational training, and job matching.

### III. AOP Section 2 – Outreach Activities, sub-section A, page 5:

<u>OHDC Comments</u>: "Insert the following language and list of locations.

Per the intent of the MOU between OED SMA and OHDC NFJP to improve service accessibility to farmworkers statewide OED staff will endeavor to coordinator outreach with NFJP in the below-listed locations on regular basis and documentation of those efforts at collaboration or joint outreach shall be reported to the management periodically of both agencies.

- OHDC Hood River, Wasco County;
- OHDC Woodburn, Marion/Polk/Yamhill Counties;
- OHDC Klamath Falls, Klamath/Lake Counties;
- OHDC Hermiston, Umatilla County;
- OHDC Ontario, Malheur County;
- OHDC Tigard, East Multnomah/Clackamas Counties;
- OHDC Hillsboro/Beaverton, Washington County;
- OHDC Affiliate Medford, Jackson/Josephine Counties;
- OHDC Affiliate Bend/Redmond/Madras, Jefferson/Deschutes/Crook Counties; and
- OHDC Affiliate North Coast, Lincoln/Tillamook/Clatsop Counties."

<u>OED Response</u>: OED believes the AOP contains sufficient language, as noted in the excerpts below, that the intent of the MOU is to improve service accessibility to farmworkers and promote collaboration between OHDC and OED.

- "OHDC has a presence in various counties in Oregon and coordinates with State Workforce Agency (SWA) outreach staff to conduct outreach to MSFWs through a Memorandum of Understanding (MOU) established in 2018." (Section 1, Assessment of Need)
- "The State Workforce Agency (SWA) signed a Memorandum of Understanding (MOU) with Oregon Human Development Corporation (OHDC)/National Farmworker Jobs Program (NFJP) in 2018 to facilitate MSFW registrations in the state's labor-exchange system (iMatchSkills) to increase access to reemployment and training services under WIOA. The MOU also provides NFJP staff access to job listings, the employer referral system, and wage data to help determine NFJP eligibility and provide enhanced services to MSFWs." (Section 2, Outreach Activities)
- "OED will also have an ongoing cooperative Memorandum of Understanding (MOU) with OHDC to provide access to the job seeker registration system, as well as connecting them to local office workforce planning." (Section 2, Outreach Activities)

OED does not believe it necessary to list each OHDC location. The following AOP statement includes mention that OED will collaborate with OHDC and by default, all locations across the state: "All OED field offices will collaborate with workforce partners and service providers to leverage training services

for MSFWs. Partners will include Oregon Human Development Corporation (OHDC)/ National Farmworker Jobs Program (NFJP) grantee of Oregon." (Section 2, Outreach Activities)

OED does not believe it necessary to include a statement about documenting outreach efforts and periodically reporting them to the management of both agencies. The MOU requires OED and OHDC local staff to meet each quarter to coordinate outreach efforts and share meeting notes with their respective managers.

The Oregon Employment Department (OED) would like to OHDC for reviewing and providing comment on the State's Four-Year Agricultural Outreach Plan (AOP) covering Program Years 2020-2023.

### C. 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.

The State Workforce Agency (SWA) has continued to meet the required MSFW Program Equity Ratio Indicators on a consistent basis up and through Program Year 2018. Equity was met in Referred to Jobs, Provided Workforce Services, Referred to Support Services, Career Guidance, and Job Development.

However WSO has fallen short of providing qualitatively equivalent and quantitatively proportionate services to MSFWs in comparison to services provided to non-MSFWs in the areas of Total Staff Hires, Staff Hires at Greater than Federal Minimum Wage, and Staff Non-Agricultural Hires.

This deficiency has consistently been addressed by the Monitor Advocate in annual MSFW program training and through Monitor Advocate Significant Office Reviews. In Program Year 2020, field office management and outreach staff will focus on addressing the needs of the agriculture employer base to improve the hiring of Total Active MSFW applicants, increase outreach to MSFWs to make them aware of WorkSource Oregon job services, training outreach staff in Job Development services, and referring MSFWs to the National Farmworker Jobs Program (NFJP), which focuses on non-agriculture vocational training services.

The SWA technical department is in the process of updating the state's registration and intake system to better align with the new WIOA definitions and performance measures. This will improve the overall quality and accuracy of MSFW registrant data for WIOA performance reporting. Monitoring on a quarterly basis will also be a priority by the SWA so that more complete and accurate date is captured.

The Monitor Advocate will request data on number of H2-A job listings and referrals from Foreign Labor Certification staff to comply with USDOL quarterly reports.

Below are service counts by category that SWA staff provided to MSFWs in Program Year 2018 as recorded in the state's labor exchange system (iMatchSkills).

- Welcome Process Completed (one-on-one intake): 1,587
- Resume Assistance: 228
- Next Steps Planning: 2,434
- Job Search Planning: 495
- Job Search Workshop: 123
- Job Coaching: 257
- Staff Referrals to Job Listings: 548

• SNAP Employment and Training Assessments: 407

### D. Assessment of Progress

The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

### Assessment of Previous AOP Program Years 2016-2019

The progress made on services to MSFWs in Oregon during the four year period, 2016 through 2019, can best be described as times of making strides with periods of unintended complacency. Ensuring that services be provided qualitatively equivalent and quantitatively proportionate compared to other job seekers continue to be a struggle.

The Complaint System was an area of good outcomes, as staff were able to resolve 90% of complaints at the local level - a good outcome for MSFWs.

Simple follow ups with MSFW clients following job referrals, H2-A job listing promotion and advertisings, job fairs for MSFWs, updated and complete MSFW registrations in the state's labor-exchange system, and communication with agriculture employers regarding domestic MSFW referrals would significantly improve outcomes if implemented and managed throughout the SWA.

MSFWs should be recognized in all WSO centers as a targeted population entitled to effective and equal access to the full range of workforce services. Federal regulations under the Judge Richey Court Order of 1974 mandates that MSFWs receive services on a quantitatively proportionate and qualitatively equivalent basis as those provided to non-MSFWs. During Program Year 2018, a violation of the Judge Richey Court Order recognized that MSFWs were not receiving assistance in getting complete registrations in the state's labor-exchange system. As a result of the Judge Richey Court Order, the OED (SWA) will take uniform, complete applications for each Migrant Seasonal job applicant utilizing Employment Service offices, including a meaningful history of prior employment, training and education of the applicant and a statement of their desired training and/or employment goals, and utilize such applications in providing applicants with and referring them to available jobs, and training opportunities directed to upgrading job capabilities. This was written up in the State Monitor Advocate annual summary to DOL. New processes and procedures are being implemented to correct this violation. Designated MSFW representatives within each workforce area will work with field office staff to keep focus on ensuring that MSFWs receive assistance to ensure complete and accurate registrations that will help match them to job opportunities other than agriculture job listings.

### E. State Monitor Advocate

The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

As the State Monitor Advocate I have been engaged in some of the writing on the Oregon AOP and agree with most but not all of the plan regarding workforce services to Oregon's MSFWs and agriculture employers

Fernando Gutierrez, State Monitor Advocate

## Wagner-Peyser Assurances

The State Plan must include assurances that:

The State Plan must include

1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan Yes and timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3));

Include

The State Plan must include	Include
2. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;	Yes
3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser Act services, Adult and Dislocated Worker programs and Youth Programs under Title I; and	Yes
<ul> <li>4. SWA officials: <ol> <li>Initiate the discontinuation of services;</li> <li>Make the determination that services need to be discontinued;</li> <li>Make the determination to reinstate services after the services have been discontinued;</li> <li>Approve corrective action plans;</li> <li>Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days;</li> <li>Enter into agreements with State and Federal enforcement agencies for enforcement-agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and</li> <li>Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.</li> </ol> </li> </ul>	Yes

## Wagner Peyser Program Performance Indicators

### Performance Goals for the Core Programs

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

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

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

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

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

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

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

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

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

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

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

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

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

Performance Indicators	PY 2020	PY 2020	PY 2021	PY 2021
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
	68.2		68.2	
Quarter After Exit)				
Employment (Fourth Quarter	68.0		68.0	
After Exit)				

PY 2020	PY 2020	PY 2021	PY 2021
Expected Level	Negotiated Level	Expected Level	Negotiated Level
6,500		6,600	
Not Applicable	Not Applicable	Not Applicable	Not Applicable
Not Applicable	Not Applicable	Not Applicable	Not Applicable
Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>
	Expected Level 6,500 Not Applicable Not Applicable	Expected LevelNegotiated Level6,500	Expected LevelNegotiated LevelExpected Level6,5006,600Not ApplicableNot ApplicableNot ApplicableNot ApplicableNot ApplicableNot Applicable

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

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

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 Stateadopted 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 Oregon Council of Adult Basic Skills Development (OCABSD) made a recommendation in October 2018 to the Oregon State Title II leadership to have Oregon Title II programs transition from the Oregon-specific Oregon Adult Learning Standards (OALS) to the nationally recognized College and Career Readiness Standards (CCRS). There was interest in preserving certain elements of the Oregon Adult Learning Standards and to consolidate them along with the CCRS into the Oregon Adult College and Career Readiness Standards (OACCRS). The rationale behind this recommendation was the alignment of the CCRS with the new CASAS Reading and Math GOALS which are the required assessments in Oregon, together with access to the many resources and materials available nationally to support implementation of CCRS. During program year 2018-19, a Learning Standards Reconciliation Project took place whereby a group of expert trainers, many of whom had previously developed the OALS, created Mathematics and Language Arts Handbooks to accompany the implementation of OACCRS. In addition a training module was created with a view to orienting programs to CCRS during program year 2019-20. Training and professional development will continue to be offered on an ongoing basis to Title II program staff. In addition support for the development and implementation of Professional Learning Communities for local providers will be given.

## 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-
- 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.

### Funding Adult Education and Literacy Programs

The eligible agency administering Title II programs in Oregon is the Higher Education Coordinating Commission (HECC): Office of Community Colleges and Workforce Development (CCWD). In July 2017, CCWD awarded three-year grants through a Request for Application (RFA) process in order to meet the statutory purposes of the Adult Education and Family Literacy Act. The RFA process adhered to the provisions set forth in WIOA Title II sections 231 and 232,

A new competition for grant funds beginning PY22 will be held and Grantees receiving funds under the competition will be required to negotiate program budgets each year using the existing performance—based funding model until such time as CCWD deems it necessary to issue a new competition for the state or a particular area of the state. By federal law, eligible providers are prohibited from using federal grant funds to supplant state or local dollars. CCWD will continue to award WIOA Title II funds as set forth in WIOA section 222(a):

- Not less than 82.5% of the grant funds to award grants and contracts under section 231 (Grants and Contracts for Eligible Providers) and to carry out section 225 (Programs for Corrections Education and Other Institutionalized Individuals). Not more than 20% of such amount will be available to carry out section 225.
- Not more than 12.5% of the grant funds to carry out State Leadership activities under section 223; and
- 3. Not more than 5% of the grant funds for the administrative expenses of CCWD.

Eligible providers, will be required to demonstrate effectiveness in providing adult education services. Examples of eligible providers, as detailed in Section 203(5) are, but not limited to:

• A local educational agency

- A community-based organization or faith-based organization
- A volunteer literacy organization
- An institution of higher education
- · A public or private nonprofit agency
- A library
- A public housing authority
- · Other nonprofit institutions that [had] the ability to provide adult education
- · A consortium or coalition of entities listed
- A partnership between an employer and an entity.

The RFA will be announced across a variety of platforms to ensure statewide participation. These platforms included HECC's monthly newsletter, press releases, and contacts with other state and local agencies and workforce partners. CCWD will ensure that all eligible providers have direct and equitable access to apply for Title II funds by:

- Using the same grant announcement, application, and proposal process for all eligible providers;
- · Providing information about the RFA to any eligible agency that requests it;
- Incorporating the considerations specified in section 231(e) of WIOA in the review criteria; and
- Evaluating all applications using the same rubric and scoring criteria.

CCWD distributes funds provided under Title II in accordance with the 13 considerations and provisions set forth in the Act and the Oregon's Unified State Plan. Applicants will be required to provide narrative detail on how they will meet each consideration.

1. The degree to which the provider is responsive to (a) regional needs as identified in the local plan under section 108; and (b) serving individuals in the community who are identified in such plan as most in need of adult education and literacy activities, including individuals who have low levels of literacy skills and who are English language learners.

2. The ability of the provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities.

3. The past effectiveness of the eligible provider in improving the literacy of eligible individuals, especially those individuals who have low levels of literacy, and the degree to which those improvements contribute to CCWD meeting its State-adjusted levels of performance for the primary indicators of performance described in WIOA section 116.

4. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan under section 108 of the Act, as well as the activities and services of the one-stop partners.

5. Whether the eligible provider's program (a) is of sufficient intensity, and quality, and based on the most rigorous research available so that participants achieve substantial learning gains, and (b) uses instructional practices that include the essential components of reading instruction.

6. Whether the eligible provider's activities including reading, writing, speaking, mathematics, and English language acquisition instruction are based on best practices derived from the most rigorous research available.

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 offer learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship.

9. 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 professional development, including through electronic means.

10. Whether the eligible provider coordinates with other available education, training and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce development boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries in the development of career pathways.

11. Whether the eligible provider's activities offer the flexible schedules and coordination with Federal, State and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs.

12. Whether the eligible provider maintains a high-quality information management system that has the capacity to report measurable participant outcomes (consistent with WIOA section 116) and to monitor program performance.

13. Whether the local area in which the eligible provider is located has a demonstrated need for additional English language acquisition programs and civics education programs.

#### Local Activities

The term "adult education and literacy activities" means programs, activities, and services that include:

- Adult education
- Literacy
- · Workplace adult education and literacy activities
- · Family Literacy activities
- · English language acquisition activities
- · Integrated English literacy and civics education
- · Workforce preparation activities
- · Integrated education and training

#### Current Local Activities

Oregon currently expends WIOA Title II funds to provide ABE, ASE, and ESL in community college and correctional settings. Instruction is guided by the Oregon Adult College and Career Readiness Standards (OACCRS) which reflect a shared vision of what adults need to know and be able to do to carry out their goals and purposes. The OACCRS are contained in Learning Standard Frameworks which provide detailed information for instruction and are organized by educational functioning levels (EFLs) as defined by the Office of Career Technical and Adult Education. The OACCRS support Title II Adult Basic Skills service providers' goal of improving access to and completion of post-secondary credentials.

Oregon also uses integrated approaches such as such as I-BEST and Vocational English as a Second Language (VESL) to address this goal. These approaches accelerate time to completion and

increase certificate and degree attainment for Adult Basic Skills students through collaboration with CTE programs and relationships with industry and local employers to identify competencies and needs. This work has been advanced by the Oregon Pathways Alliance which has used targeted investment to develop a national model for a systemic framework for career pathways. State career pathways funds are used at community colleges for advising, instruction, and support services to support ABS student in pathways and bridge programs in occupational areas such as welding, heath care, computer applications, HVAC, and automotive technology.

Programs are required to participate in professional development training and activities that focus on civics curriculum development. In addition, programs are encouraged to leverage additional grants such as the Pathways to Opportunities and the STEP (SNAP Training and Employment Program) Consortium to provide wraparound services for participants.

CCWD will require that all activities funded under Title II are of sufficient intensity and quality and based on the most rigorous research available, particularly with respect to improving reading, writing, mathematics, and English proficiency of eligible individuals. The scope, content and organization of local activities are described below.

CCWD will require all applicants to offer adult education and literacy activities and English language acquisition activities where there is local need throughout the three-year cycle.

#### Adult Education and Literacy Activities

Scope: All providers will be required to offer adult education and literacy activities.

Content: The content of adult education and literacy will be academic instruction and education services below the postsecondary level that increase adults' ability to read, write, and speak in English, and perform mathematics or other activities necessary for the attainment of a high school diploma or its recognized equivalent; transition to postsecondary education, and obtain employment. Implementation of the Oregon Adult College and Career Readiness Standards (OACCRS) which include the essential components of reading, must be evident in curriculum and instruction.

Organization: Adult education and literacy activities will use technology, services, delivery systems, which may include distance education in order to encourage measurable skill gains for learners. Programs will provide learning activities in contexts that promote attainment of high school equivalency, transition to postsecondary education or training, or employment. Programs will follow Oregon Accountability Policies and Procedures, assessing learners with approved tests and placing them in instructional levels as described by the Educational Functional Levels (EFLs) for Adult Basic Education (ABE) and Adult Secondary Education (ASE). Implementation of the OACCRS must be evident in the organization of instruction.

#### English Language Acquisition Activities

Scope: All providers will be required to offer English language acquisition where there are sufficient numbers of English language learners, i.e., eligible individuals who have limited ability in reading, writing, speaking, or comprehending the English language and whose native language is not English or who live in a family or community environment where a language other than English is the dominant language.

Content: The content of English language acquisition will be reading, writing, speaking, and comprehending the English language in order to lead to attainment of a secondary school diploma or its recognized equivalent, and transition to postsecondary education or training or employment. Implementation of the OACCRS must be evident in curriculum and instruction in English language acquisition.

Organization: English language acquisition will be of sufficient intensity and quality and based on rigorous research and effective educational practice. Activities will use technology, services, delivery systems, including distance education in order to encourage measurable skill gains for learners. Programs will provide learning activities in contexts that promote attainment of high school equivalency, transition to postsecondary education or training, or employment. Programs will follow

Oregon Accountability Policies and Procedures, assessing learners with approved tests and placing them in instructional levels as described by the Educational Functional Levels (EFLs) for English as a second language (ESL). Implementation of approved Learning Standards must be evident in the organization of instruction. Programs will offer educational and career counseling services that assist learners to transition postsecondary education or employment, or offer English language acquisition as part of a career pathway.

CCWD will require all eligible applicants to offer workforce preparation activities and integrated education and training (IET) activities no later than the third year of the three-year cycle. If funding is available, CCWD will offer incentives to programs to offer these activities earlier in the grant cycle.

### Workforce Preparation Activities

Scope: All providers will be required to offer workforce preparation activities no later than the third year of the three-year cycle.

Content: The content of workforce preparation will be the skills necessary for successful transition into and completion of postsecondary education and training, skills necessary for successful transition into employment, and other employability skills that increase an individual's preparation for the workforce. These include basic academic skills, critical thinking skills, digital literacy skills, employability skills, and self-management skills such as utilizing resources, using information, working with others, and understanding systems. Implementation of the OACCRS must be evident in curriculum and instruction.

Organization: Workforce preparation be offered concurrently with another activity such as adult education and literacy, English language acquisition, or integrated English literacy and civics, or and meet the organizational requirements for those activities. Programs will be encouraged to use the U.S. Department of Education's Employability Skills Framework or other comprehensive resource to structure workforce preparation activities. Implementation of the OACCRS must be evident in the organization of workforce preparation instruction. Workforce

preparation activities will be assessed broadly through the assessment of EFLs.

Integrated Education and Training Scope: All providers will be required to offer IET activities to learners in at least one EFL no later than the third year of the three-year cycle.

Content: IET activities will include adult education and literacy or English language acquisition concurrently and contextually with workforce preparation, and workforce training for a specific occupation or occupational cluster. An IET program will have a single set of learning objectives that identifies specific adult education content from the OACCRS, workforce preparation activities and workforce training competencies.

Organization: In order to meet the requirement that IET activities provided are for the purpose of educational and career advancement, the adult education and literacy component of the program will be aligned with the OACCRS. IET activities may also be a part of a career pathway. CCWD may fund eligible applicants to offer workplace adult education and literacy activities, family literacy activities, and/or integrated English literacy and civics education activities (IEL/CE) (section 231) during the three-year cycle.

#### Workplace Adult Education and Literacy Activities

Scope: Some providers will offer workplace adult education and literacy activities during three-year cycle.

Content: Workplace adult education and literacy activities will include the content of adult education and literacy or English language acquisition which addresses the improvement of the productivity of the workforce. Implementation of the OACCRS must be evident in curriculum and instruction. Organization: Workplace adult education and literacy activities will be offered by the eligible provider in collaboration with an employer or employee organization. Implementation of the OACCRS must be evident in the organization of instruction.

# c. Corrections Education and other Education of Institutionalized Individuals

Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will fund, in accordance with the requirements of title II subtitle C, any of the following academic programs for:

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

Oregon will continue to support corrections education and education of other institutionalized individuals under section 225 of WIOA. Academic programming will include adult education and literacy activities, English language acquisition activities, and peer tutoring. Where feasible, section 225 funds will also be used for integrated education and training and career pathways in order to increase the number of institutionalized individuals transitioning to post-secondary education.

Grants of section 225 funds will be awarded in a separate application process in accordance with the requirements of Subpart C in Title II of WIOA. CCWD will ensure that all eligible providers have direct and equitable access to apply for these funds by:

- Using the same grant announcement, application, and proposal process for all eligible providers;
- Providing information about the RFA to any eligible agency that requests it;
- Incorporating the considerations specified in section 231(e) of WIOA in the review criteria; and
- Evaluating all applications using the same rubric and scoring criteria.

CCWD will give specific consideration in the criteria to eligible applicants that indicate priority of service to individuals who are likely to leave the correctional institution within five years of participation in the program.

## 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.

CCWD will distribute Title II funds to successful grant applicants according to WIOA guidelines and the needs of local programs. Competitive grant awards will comply with considerations in Section 231(e) of WIOA.

Oregon's Integrated English Literacy and Civics Education services are designed to enable English language learners (ELLs), including professionals with degrees or credentials in their native countries, 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.

Local providers will build IEL/CE services on the successful practices and principles related to citizenship and civic participation contexts. These may include classroom and experiential activities such as:

•Instructional experiences that teach English language reading, writing, speaking/listening, and math skills along with instruction in civic responsibility by collaborating with a local police department to help students get drivers' licenses, understand the rules of the road, identify their rights and responsibilities as drivers, and prepare for interactions with local law enforcement while driving;

•An instructional unit called on 'The Road to Citizenship 'which takes participants through the entire citizenship process, including field trips to US Office of Citizenship and Immigration Services. Participants use the actual forms and materials needed to apply for and pass the citizenship exam and create portfolios of all the documents they need to collect and turn in to complete the process; or

•A unit, responding to a participant interest survey, on accessing medical services for families with children. The participants help plan a Health Fair that provides information to their community, including health screenings, an immunization clinic, and presentations by public school leadership, health care providers and insurance carriers to inform parents how to access care and services for themselves and their children.

Programs funded under section 243 will have the additional requirement to provide Integrated English literacy and civics education in combination with integrated education and training services.

### e. State Leadership

1. Describe how the State will use the funds to carry out the required State Leadership activities under section 223 of WIOA

CCWD will pursue the following required State Leadership Activities under this section of 223 of WIOA:

### 1. Alignment with other core programs:

Activities will include but may not be limited to:

- Explore the potential revision of Oregon Pathways to Adult Basic Skills (OPABS) and expansion of I—BEST and VESL models that integrate education and training
- Participation and active engagement in the Oregon Workforce Systems Executive Team (WSET). The team is a partnership consisting of the Workforce Innovation and Opportunity Act (WIOA) Program Directors that are committed to an aligned vision of the workforce system and that seeks to collectively serve business and program participants across programs and funding streams and is supported by agency executives and the Governor's office. WSET will continue to work together to integrate all programs in the public workforce system to reduce duplication and lift families out of poverty. The State Director will continue to work with Career and Technical Education leaderships throughout the state to develop seamless transitions for WIOA Title II students in to career pathways.
- Continue to support for the development of instructional content and models for career pathways

### 2. Establishment of high quality PD:

Activities will include but may not be limited to:

- Exploration and collaboration in the development of standardized components of an adult education and literacy orientation process with identified learning outcomes
- Continued maintenance and updating to the professional development framework for the state that outlines required professional development activities in the areas of assessment, data collection, reporting and use, OACCRS and Program Administration. These activities will be outlined in the Oregon Adult Basic Skills Policy Manual.

### 3. Provision of TA:

Activities will include but may not be limited to:

- Provide technical assistance to eligible providers on strategies to achieve negotiated targets on the primary indicators of performance and other identified areas of compliance.
- Provide support to meet WIOA data collection and reporting requirements.

### 4. Monitoring and evaluation:

Activities will include but may not be limited to:

 CCWD will communicate to programs their responsibilities related to compliance with the award terms and conditions via multiple methods including training for new and continuing programs and by describing responsibilities in the Oregon ABS Policy Manual. In addition, CCWD will annually assess the risk of programs and conduct both desk and onsite monitoring to ensure compliance with federal regulations and grant conditions. Program Improvement Plans will be developed and technical assistance provided.

2. Describe how the State will use the funds to carry out permissible State Leadership Activities under section 223 of WIOA, if applicable

CCWD will pursue the following permissible state leadership activities:

- To promote transition of adult education students to employment and/or postsecondary education, CCWD will fund the development of instructional content and models for career pathways. CCWD will explore the revision of OPABS and support the expansion of I—BEST and VESL models that integrate education and training as a method to facilitate student transition.
- Technical assistance to eligible providers will include support for developing and implementing strategies to achieve measurable progress toward the state adjusted performance measures
- Exploration and collaboration in the development of standardized components of an adult education and literacy orientation process with identified learning outcomes
- Development of Professional Development materials that are based upon state and local program needs in order to improve and/or ensure program quality and compliance.
- Support state and local participation in professional development at state and local meetings and conferences.

## 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.

CCWD as the eligible agency will assess the quality of adult education and literacy activities on regular basis by:

- Reviewing quarterly performance (e.g., number of students enrolled, hours attended, matched pre and post—tests, etc.);
- Conducting annual desk monitoring and onsite technical assistance visits; and
- Reviewing annual financial reports.

Frequent reviews will utilize data collected and reported in TOPSpro Enterprise more effectively for continuous program improvement, allowing CCWD to tailor technical assistance to areas of enrollment, instruction, student persistence, and transition to either employment or postsecondary training.

Oregon Title II professional development participants currently assess their experience by completing an evaluation after each training. Participants also frequently have the opportunity to reflect on each training day or event and share their reflection with the professional development staff. This keeps the training team apprised of the participants' progress, understanding, and plans for using new information. As the State develops and implements interactive training modules – posted and readily accessible on the CCWD website - to support the Oregon Adult College and Career Readiness Standards, faculty will be able to work in groups, with workshops facilitated by a trainer, or in selfpaced mode using accompanying workbooks to document progress. The State will continue to review evidence of implementation, e.g., course outlines, lesson plans, and classroom observation, as other training opportunities in Learning Standards, data collection and use, English language acquisition, and other topics in order to ensure the quality of professional development.

In addition to the above, as part of the annual risk assessment policy, programs will be asked to selfreflect on their level of risk in the area of professional development and evaluate their participation in required activities. These activities include attendance at professional development planning meetings, online trainings for faculty, program administrators, and data professionals, participation in program-based professional learning communities and the completion of training plans and assignments. Programs are required to provide evidence of the completion of these activities by submitting the documents listed in the ABS Policy Manual for the scrutiny of state staff. The State ABS Team will also review this documentation and the self-assessment outcomes to identify those programs in which professional development technical assistance is needed. The self-assessment tool will be evaluated for effectiveness and refined as necessary in order for the information collected to provide a basis for examining the effectiveness and quality of instruction. The State ABS Team will also review data related to student outcomes (for example Measurable Skill Gains) and offer assistance (for example site visits, technical support for faculty and supervisors and comprehensive needs' analysis) to programs where high risk appears to correlate with low gains.

# Adult Education and Family Literacy Act Program Certifications

States must provide written and signed certifications that:

The State Plan must include	Include
1. The plan is submitted by the State agency that is eligible to submit the plan;	Yes
2. The State agency has authority under State law to perform the functions of the State under the program;	Yes
3. The State legally may carry out each provision of the plan;	Yes
4. All provisions of the plan are consistent with State law;	Yes
<ol><li>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;</li></ol>	, Yes
6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;	Yes
7. The agency that is submitting the plan has adopted or otherwise formally approved the plan; and	Yes
8. The plan is the basis for State operation and administration of the program;	Yes

## Adult Education and Family Literacy Act Program Assurances

The State Plan must include assurances that:

The State Plan must include	Include
1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);	Yes
2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;	Yes
3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible individuals" within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;	
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	Yes

The State Plan must include	Include
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).	Yes

## Authorizing or Certifying Representative

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of

Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an

officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Please download and sign the forms below. Please scan and return the forms to wioa@ed.gov at the same time you submit your State Plan via the portal.

1. SF424B - Assurances – Non-Construction Programs (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)

- 2. Grants.gov Certification Regarding Lobbying (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)
- 3. SF LLL Form Disclosure of Lobbying Activities (required, only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)

APPLICANT'S ORGANIZATION	Enter information in this column Oregon Higher Education Coordinating Commission		
	Office of Community Colleges & Workforce Development		
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	Enter information in this column		
First Name	Donna		
Last Name	Lewelling		
Title	ABS State Director		
Email	Donna.j.lewelling@state.or.us		

# Section 427 of the General Education Provisions Act (GEPA)

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 posted at https://www2.ed.gov/fund/grant/apply/appforms/gepa427.doc.

Local programs will be required to describe the steps they will take to ensure equitable access to Title II activities for participants with race, national origin, color, disability, or age barriers. For state-funded professional development activities, accommodations will be made as appropriate to ensure equitable access. The state will ensure local programs receive opportunities for professional development in complying with GEPA requirements by providing information during at least one State Director meeting on an annual basis.

# Adult Education and Literacy Program Performance Indicators

### Performance Goals for the Core Programs

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

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of

performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

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

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

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

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

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

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

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

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

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

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

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

Performance Indicators	PY 2020	PY 2020	PY 2021	PY 2021
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter After Exit)	31.0%		32.0%	
Employment (Fourth Quarter After Exit)	20.0%		21.0%	
Median Earnings (Second Quarter After Exit)	\$3520		\$3590	
Credential Attainment Rate	13.0%		14.0%	
Measurable Skill Gains	45.0%		46.0%	
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

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

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

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan [13] must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA:

[13] Sec. 102(b)(2)(D)(iii) of WIOA

### a. Input of State Rehabilitation Council

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. Input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer

## satisfaction, and other Council reports that may have been developed as part of the Council's functions;

INPUT 1: The SRC has seen some changes to the new structure of Vocational Rehabilitation (VR) and would like to know what the Vocational Rehabilitation Program is most proud of or feels most accomplished about in the time since the last State Plan.

INPUT 2: Regarding Pre-Employment Transition Services (Pre-ETS) and Youth Transition Program (YTP), the SRC would like to acknowledge the hard work VR has done implementing these programs and services. However, individuals in rural and underserved areas in Oregon have expressed concern and frustration about the lack of services in their communities. This information shows that while any student in Oregon can request Pre-ETS, these services are not known to teachers, students, or their families within underserved communities.

RECOMMENDATION: The SRC recommends that a plan to implement these services and education statewide be created and cost evaluated before the next State Plan.

INPUT 3: Per the Workforce Innovation and Opportunity Act (WIOA), VR is required to be integrated/work closely with WorkSource Centers. The SRC wants to stress the importance of making sure these centers are best serving VR consumers by understanding what services VR offers, knowing how to best assist individuals with disabilities and making sure these centers are fully accessible.

RECOMMENDATION: In order to best support VR's clients, the SRC encourages VR to evaluate the current accessibility of the centers, including but not limited to building access and other Americans with Disabilities Act (ADA) guidelines, electronic and print material access, and assistive technology devices and software; as well as provide training to center staff to help them understand VR services and how to work with individuals with all types of disabilities before further integration into these centers takes place.

INPUT 4: In the Comprehensive Statewide Needs Assessment (CSNA) 2017, one area of concern to consumers was not being able to receive assistive technology in a timely manner.

RECOMMENDATION: To assist in speeding up services to clients who needs assistive technology, the SRC recommends that staff be provided training on assistive technology service providers throughout the state who conduct assessments to identify most appropriate accommodations based on clients' needs; as well as provide training to staff on the Oregon Statewide Assistive Technology program, which will allow VR Counselors to rent a variety of assistive technology to bridge the length of time it may take to purchase equipment following an assessment.

INPUT 5: There is no doubt that VR clients throughout the state need a variety of services in order to be successfully employed in competitive employment with increased independence. Members of the SRC have heard from field staff about the lack of service providers in their areas and the cost to get service providers to more remote areas of Oregon. Some rural office VR staff have even resorted to conducting job development and job coaching tasks in house.

RECOMMENDATION: The SRC recommends creating and distributing a Service Provider Survey in 2020 and using the data from the Survey and the upcoming CSNA report to evaluate areas in the state where service providers are scarce and develop a plan for how to recruit more service providers to fill these needs.

## 2. The designated State unit's response to the Council's input and recommendations; and

Thank you for the Input regarding the VR Program. The VR Program looks forward to working with the SRC in the future as we continue to provide quality rehabilitation services to Oregonians with disabilities.

### Program Response to Input #1:

The VR Program has undergone significant evolution since the previous State Plan was developed in 2016 and updated in 2018. The Program has undergone significant changes in leadership and is proud of the fact that we effectively implemented the requirements of new federal legislation as well as developing a new Executive Leadership Team. With new, cohesive leadership the program can continue to provide high quality rehabilitation service to both Oregonians with disabilities and the employers of our communities.

### Program Response to Input #2:

Thank you for the input regarding Pre-ETS and YTP services. It is the goal of the VR Program to implement Pre-ETS and YTP statewide. We have received three positions from the legislature to support the work in this area. We continue to work with our partners at the Department of Education to make sure that this service is known and available to students with disabilities, their families and educators.

### Program Response to Input #3:

The VR Program looks forward to working within the statewide workforce system and is proud to be a partner in the development of an accessible and efficient service delivery system regarding employment. It is the goal of the workforce system to create a system that is accessible to all Oregonians and the Program stands ready to assist the local WorkSource Centers and Local Workforce Development Boards (LWDBs) in identifying any accessibility and service delivery barriers to Oregonians with disabilities that wish to access the workforce system. We will continue to work with the Oregon Employment Department and our other workforce partners in this process.

### Program Response to Input #4:

The VR Program agrees that further education regarding assistive technology is a great benefit to Oregonians with disabilities and our staff. We have revamped our training unit and continue to integrate assistive technology, its uses, its benefits, the resources available to the Program and the procedures to obtain at every level, from assessing the need for it to the purchase and implementation when appropriate. The Program understands the necessity and importance of appropriate assistive technology in ensuring employment success for our clients.

### Program Response to Input #5:

The Program agrees there are certain areas of the state that lack capacity in employment services. The Program will continue to identify these areas and create mitigation plans. The Program is coordinating efforts with State Agencies, such as the Office of Developmental Disability Services (ODDS) and other community partners to explore and expand capacity. The Program has requested technical assistance from the Youth Technical Assistance Center (Y-TAC) to provide guidance in the development of capacity.

## 3. The designated State unit's explanations for rejecting any of the Council's input or recommendations.

Oregon VR did not reject any SRC feedback.

Oregon VR and the SRC have undergone significant changes in leadership and personnel in the last two years. Both entities are developing new working relationships with each other and in fact, internally. The VR program stands ready to assist the SRC in whatever capacity required to provide

quality services to Oregonians with disabilities and looks forward to a continuing partnership with the SRC and the expertise and input it brings.

## b. Request for Waiver of Statewideness

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

# 1. A local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;

Oregon Vocational Rehabilitation (VR) requests a continuation of its waiver of state–wideness for its Youth Transition Program (YTP). Through this program, transition age youth with disabilities are provided with enhanced activities and services that lead to employment or career–related post-secondary education or training.

The Program assures that current intergovernmental agreements (IGAs) that are in effect provide the non-federal share of the costs associated with the delivery of YTP services. As new local education agencies (LEAs) are brought into the system, new IGAs will be completed that ensure their participation in the costs of provision of these services.

## 2. The designated State unit will approve each proposed service before it is put into effect; and

Sixty-nine cooperative agreements have been executed with local school districts and educational service districts (ESDs), representing over 200 schools, consortia of districts, and ESDs. These agreements will operate local YTP for the July 1, 2019 – June 30, 2021 period. All the proposed services outlined in these cooperative agreements have been approved by VR.

In instances involving multiple districts, the districts involved have additionally been required to have memorandums of understanding (MOUs) with each other in order to ensure that YTP is appropriately and effectively carried out.

Under the terms of the 2019-2021 YTP Cooperative Agreements, districts participating in YTP will be responsible for providing Pre-Employment Transition Services (Pre-ETS), Core YTP and other activities, services, and supports described above. Provision of these activities, services, and supports will be subject to VR's approval prior to implementation and any and all applicable requirements of VR's State Plan. In addition, the 2019-2021 YTP Cooperative Agreements will:

٠

 Specify that participating districts or ESDs are to provide matching funds equal to one-third (1/3) of the grant awarded by VR to a district or ESD for carrying out the agreement. Moreover, the match must be from a district's or ESD's cash funds; and neither federal nor "in-kind" district resources, including donations or contributions of property or services, may be applied towards the match.  Require that services provided pursuant to agreements will be provided in accordance with the Order of Selection, if invoked, under which VR operates, as long as the Order remains in effect.

### 3. Requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

Requirements of the VR services portion of the 2020 Combined State Plan will apply to any services approved under this waiver.

The contracts with the local entities providing YTP were written with the VR service portion of the Combined Plan in mind and therefore the requirements will be adhered to.

## 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;

Oregon Vocational Rehabilitation (VR) has developed and maintains cooperative agreements and cooperative relationships where necessary with federal and state agencies not carrying out activities through the statewide workforce development system. This cooperation includes, but is not limited to the Centers for Independent Living (CILs), Office of Developmental Disability Services (ODDS), local intellectual and developmental disabilities (I/DD) brokerages, county service providers, Oregon's Mental Health Programs (including programs that serve in and out of school youth), the Client Assistance Program (CAP), Tribal VR 121 Programs, Oregon Department of Education (ODE), local school districts, community colleges, Access Technologies Inc. (ATI), and local agencies providing services to our clients. VR strives to have cooperative relationships that streamline referral and service delivery, including joint planning, leverage funds, provide coordinated and non–duplicated services, and maximize the use of wrap around services to ensure success. VR's goal is to simplify, streamline, and expedite services to clients while maximizing access to services that will help with their success.

## 2. State programs carried out under section 4 of the Assistive Technology Act of 1998;

Access Technologies, Inc. (ATI), serves as the Implementing Entity for the Oregon Statewide Assistive Technology (AT) Program; providing all state level and state leadership activities as mandated by the Assistive Technology Act of 1998, as amended. ATI has entered into an administrative agreement with Oregon's Lead Agency (the Department of Human Services or DHS). This administrative agreement sets forth the activities that must be conducted by ATI on behalf of DHS and the system of oversight to be provided by ATI's Board of Directors. DHS has assigned a Project Officer to oversee the administrative agreement, and who will meet with the President of ATI quarterly to discuss activities and the implementation of this State Plan. The Project Officer, and/or a representative from the Lead Agency, attends all Advisory Council meetings for ATI. ATI submits monthly expenditure reports to the Project Officer for review and approval, while the Lead Agency Project Officer ensures that the DHS fiscal unit provides timely and appropriate assistance to ATI. ATI also provides annual reports to DHS on activities completed, activities planned, and any data related to those activities.

## 3. Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;

Oregon VR has no cooperative agreements or cooperative relationships with programs currently being carried out by the Under Secretary for Rural Development of the Department of Agriculture.

### 4. Non-educational agencies serving out-of-school youth; and

. Oregon VR does not currently have any cooperative agreements with non-educational agencies serving out of school youth.

### 5. State use contracting programs.

Oregon VR utilizes the Statewide Office of Contracts and Procurement to memorialize service delivery arrangements using cooperative agreements and contracts with entities outside of the statewide workforce development system.

## d. Coordination with Education Officials

Describe:

1. The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students

The 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.

Oregon VR has third party cooperative agreements with over 120 school districts in the state to operate the Youth Transition Program (YTP). This constitutes more than three quarters (3/4) of the high schools in Oregon. Performance benchmarks for YTP are in place within the cooperative agreements to ensure the timely development and approval of individualized plans for employment for the participating students.

VR actively works in coordination with state and local education agencies (SEAs and LEAs) to assist eligible and potentially eligible students in pursuit of their employment goals and to facilitate their

transition from school to employment, higher education or vocational training. This occurs on a regular and continuing basis as part of delivery of individualized vocational rehabilitation services to youth now including the provision of Pre–Employment Transition Services (Pre-ETS).

It necessarily includes development and approval of individualized plans for employment as early as possible during the transition planning process, but at the latest 90 days after the student is determined eligible for VR services (or in the event VR is subject to an Order of Selection and a waitlist for services is being utilized, before each eligible student able to be served leaves the school setting).

## 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;

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;

The Oregon Department of Education (ODE) and VR have executed an agreement and MOU to coordinate transition services leading to successful transition for students with disabilities from a free and appropriate public education to post-secondary career–related training and employment activities.

VR and ODE additionally have developed another agreement to co-fund eight regional Transition Network Facilitators (TNFs) and three regional support staff who cover the entire state. The role of the TNFs is to coordinate transition services between every LEA and the local VR offices throughout the state. The TNFs are working with every LEA to ensure the provision of Pre-ETS are available to all students with disabilities in need of such services.

### VR Transition Staff:

VR has a full-time YTP Coordinator. This position is responsible for leading and coordinating YTP and more generally VR's transition efforts as part of a larger Program transition team, including serving as VR's liaison to the Oregon Department of Education. This coordinator and other VR staff work closely with Oregon's community colleges and workforce programs on transition and related service coordination issues.

VR also has a full time Pre-ETS program coordinator. The person in this position is responsible for the development of Pre-ETS policy, procedures and data validation. Additionally, this staff member is the administrator of contracts pertaining to the delivery of Pre-ETS services and sits on the State Advisory Council for Special Education and its Transition Advisory Committee.

The ODE has a Secondary Transition Specialist and this position is a member of the State Rehabilitation Council (SRC), VR's policy–making partner. The YTP Coordinator, ODE Transition Specialist, and the University of Oregon (UO) YTP Technical Assistance Team, together comprise the cross–agency YTP administrative team.

In addition, VR and its YTP partners:

 Maintain a YTP website. The site (ytp.uoregon.edu) provides information on transition, YTP, special education and related services, research, training, and links. The intended audience is school and VR personnel, youth and adults with disabilities, parents and other supporters of such individuals, and the public at large. The website is also used to transmit and report on YTP performance data.

- Jointly sponsor and organize two statewide transition conferences, provide training on a regional basis throughout Oregon about transition, Individuals with Disabilities Education Act (IDEA), modified diploma standards, and the VR process.
- Serve as liaison to the Oregon Association of Vocational and Special Needs Personnel's Board of Directors; and UO and ODE representatives serve on the SRC.

# B. Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

YTP Transition Specialists, TNFs, and school transition staff members partner with local VR offices and VR counselors to coordinate the development and implementation of individualized education programs. When a student is determined eligible for VR services, he or she works with a school transition specialist and a VR counselor to develop an Individualized Plan for Employment (IPE) that reflects the interests, strengths, and abilities of the student, and which addresses the barriers to training or employment outcomes for the student. Should it be necessary for VR to reinstitute an Order of Selection, the scope of VR services and expected employment outcomes for all individuals served by VR, including YTP students, will be modified to comply with VR's Order of Selection

# C. Roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

Under YTP, VR is responsible for:

- Administering and coordinating YTP.
- Entering into YTP cooperative agreements (referred to as intergovernmental agreements in Oregon) with school districts that wish to participate in YTP and that are selected through a competitive process. The agreements provide districts with the funding needed for the staff that deliver a district's YTP activities, services, and supports.
- Working with school district staff at the VR field/school level to provide YTP activities and services and providing needed technical assistance and support.

All financial agreements for the sharing or blending of funds are handled by VR and ODE through cooperative agreements. For example, with VR's YTP program the participating school districts provide VR with matching funds that are paid back to the schools along with VR program funds when they provide the required services through the cooperative agreement. In this way, VR can assure that the services paid for are an enhancement to the services the school district are required to provide.

The MOU between ODE and VR outlines and designates the lead representatives that will coordinate services between the two agencies, including YTP and other cooperative transition services and programs. Oregon VR administers the YTP in over two thirds (2/3) of the school districts in Oregon. This program is funded through third party cooperative agreements where LEAs provide one third of the funding for the total budget and VR provides two thirds (2/3) of the funding. All other financial agreements for the sharing or blending of funds are handled by VR and ODE through cooperative agreements.

D. Procedures for outreach to and identification of students with disabilities who need transition services.

VR and ODE co-fund eight regional TNFs who cover the entire state. VR and ODE also have a data sharing agreement to identify potentially eligible students.

These eight regional TNFs work with every high school in the state to educate school staff, families, and other provider agencies to perform outreach and identification of students with disabilities in need of transition services.

Over 120 school districts in the state run YTP which constitutes more than three quarters (3/4) of the high schools in Oregon.

VR has a Statewide Transition Coordinator that works with ODE to develop trainings that help school's identification of students with disabilities who need transition services.

VR counselors regularly attend functions (back to school nights, job clubs, vocational classes, etc.) at high schools to educate youth, families, and school staff about VR services. In many cases VR staff collaborate with districts to provide Pre-ETS which leads to identification of students that can benefit from VR services.

## 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.

Oregon Vocational Rehabilitation (VR) continues to establish relationships with private non-profit and for-profit entities that are community rehabilitation providers, medical services providers, and providers of other services and supports that are required by VR clients to achieve the goals in their Individualized Plans for Employment (IPEs). VR staff develop relationships in the community to meet the needs of their client and to provide choice of providers to their clients. Services provided by the community rehabilitation providers, contractors, and vendors include medical and psychological assessments and services, job development and employer services, job coaching and facilitation, accommodations and ergonomics, independent living services to support employment goals, follow up services, and other services especially for individuals with significant disabilities. The cooperative relationships vary from information and referral relationships to fee–for–service and pay for performance relationships. VR follows State of Oregon contractual processes when establishing contracts for services.

VR works with and establishes relationships with non-profit organizations to fully utilize the benefits provided through the Social Security Administration (SSA) Ticket to Work (TTW) program. In January 2010, Oregon VR initiated a TTW shared payment agreement pilot with ten community mental health programs that provide evidence-based mental health supported employment services. These mental health agencies are governed by the Oregon Health Authority (OHA) who contracts with the Oregon Supported Employment Center for Excellence (OSECE) to provide annual programs and technical assistance. These agreements allow Oregon VR to be the Employment Network of record with SSA and partner with the mental health agency to provide dual services to an individual. Once the VR case is closed, the mental health agency continues to support the individual until the support is no longer needed. If the individual works and reaches the SSA TTW wage thresholds, Oregon VR receives TTW payments which in turn are split with the mental health agencies. This pilot evolved into a project that has strengthened the relationship between VR and these participating agencies by providing additional TTW dollars for additional program funding. As of July 2019, we have nineteen agreements in place.

## 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.

Oregon Vocational Rehabilitation (VR) works closely with other state agencies whose populations benefit from VR supported employment services. VR, the Oregon Department of Education (ODE), and the Office of Developmental Disability Services (ODDS) work together with the state's Employment First program to ensure that individuals who experience intellectual and/or developmental disabilities (I/DD) receive coordinated and sequenced services that meet their employment needs. This multi-agency collaboration operates under the guidance of Executive Order 15-01 and the Lane v. Brown Settlement, actively working to ensure that policies and services are aligned in a way that makes sense for transition age students, as well as adults, seeking services. The VR/ODDS Collaborative Agreement was updated in September 2018 and continues to guide the close relationship of the two agencies. VR has a close relationship with the Oregon Health Authority (OHA) Behavioral Health programs to ensure that individuals who access VR's services who are also working with Mental Health Programs across the state get access to guality Individualized Placement and Support (IPS) Services. VR continues our collaboration with OSECE who oversees the fidelity of the 37 programs that currently offer IPS services throughout the state. VR continues to work with OSECE to expand the availability of these services across the state. In addition to aligning policies and service sequences, VR is working with OHA Behavioral Health and ODDS to ensure that our certification requirements for service providers are in alignment. In 2018, VR amended the 2015 Job Placement Services contract. Joint certification and coordinated training continue to make it easier for providers of job placement and support services who are funded by VR to continue to provide employment support services to clients when hand-offs occur between agencies. VR currently has more than 200 providers under contract through our amended Job Placement Services Contract. In 2018, VR scheduled training for job placement contractors, on a monthly basis, using the materials developed in 2017 by VR in collaboration with OSECE and ODDS. VR continues to systematically identify areas of the state where capacity issues exist to assure that a training is available in those areas. Recruitment of providers in these areas continues to be a priority moving forward. The pilot that would measure the effectiveness of a rural transportation rate change was examined but found to not be feasible because of the extreme difference in distances in Eastern Oregon. A second pilot, ensuring that those VR clients with the most significant disabilities are assigned to the highest tier of job development has been designed and has been piloted in 2019. All aspects of this pilot will be monitored closely, including whether the higher rate of pay in that tier corelates with an increase of capacity in rural areas. VR and ODDS, with the Home Care Commission as the training entity, are increasing job coach capacity through use of Personal Care Attendants. Additionally, VR is working with several community colleges to explore the possibility of a career pathway program that will train future service providers in a curriculum jointly developed with these community colleges.

### g. Coordination with Employers

Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

#### 1. VR Services; and

Oregon Vocational Rehabilitation (VR) knows that given the needs of our clients, a robust employer engagement model is required to be successful. VR continues to use job placement contractors to identify individual employment, assessment, and training opportunities for those who require those services to become employed. Additionally, VR strives to expand the base of employers who work with our clients who do not require individualized outreach to employers. By leveraging opportunities with other workforce partners, VR believes that it can increase employment opportunities for Oregonians with disabilities and begin to change perceptions associated with individuals with disabilities in the workforce.

VR will:

• partner with the local Employment Department Business Teams to coordinate employment services

• partner with the Local Workforce Development Boards (LWDBs) to coordinate employer engagement activities

- provide information to VR staff regarding apprenticeship programs and processes
- partner with local mental health providers in coordinating employment services
- continue to partner with Oregon Commission for the Blind (OCB) on employment services
- · participate and coordinate local employer recruitment events and job fairs

• contract with providers to provide local employer engagement events and activities for individuals with disabilities

- · provide training to contracted job placement and partner providers
- establish local MOU's with federal business contractors
- provide information to VR staff regarding 503 information, protocols and processes
- provide local trainings and resources on disability awareness and accommodations
- establish partnerships with local nonprofits that provide employment services
- participate in local area business events to enhance disability awareness
- · promote and develop local area internships for individuals with disabilities

Employer survey respondents were asked to rate the perceived helpfulness of a variety of potential services provided to employers by VR. The survey items with the highest perceived helpfulness reported by respondents to the business survey were:

- Providing workers with disabilities with the accommodations and supports they need to do the employer's work;
- If concerns arise, providing consultation with management, the workers, and co-workers to resolve the concerns;
- Placing qualified individuals in internships at the business with full reimbursement of the employer's expenses;
- Providing training consultation and resources related to the provision of reasonable accommodations; and
- Finding workers that meet the employer's workforce needs.

### 2. Transition services, including pre-employment transition services, for students and youth with disabilities.

VR's Youth Transition Program (YTP) is operating in over 120 school districts across the state to provide Pre–Employment Transition Services (Pre-ETS) which includes "work experience" and "career counseling."

YTP Transition Specialists work directly with employers to:

1. Perform worksite assessments before student placement

2. Train students in workplace readiness

3. Provide screening and referral of appropriate youth for Identification of appropriate worksites and tasks

4. Provide counseling on opportunities for enrollment in comprehensive training opportunities to meet the desired qualification of employers

In the Portland Metro area, VR staff are working with health providers, Legacy and Providence Health, to pilot training and streamlined hiring programs for students with disabilities. Students placed in competitive integrated employment with these employers are supported with 12 months of follow along services to ensure stable employment.

VR Contractors are working with business and schools regarding employer engagement models to offer competitive, integrated employment and career exploration opportunities. These trainings include:

1. Pre-employment trainings with school staff to meet employer needs

2. Interest inventories with students, trainings on developing partnership agreements, trainings, on the job needs analysis, and marketing school-based programs

3. Pre- and post-training evaluations for students involved in work experiences.

#### 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 Oregon, the Oregon Health Authority (OHA) is the agency that administers the State Medicaid Program. Through a series of intergovernmental agreements (IGAs) and memorandums of understanding (MOUs), the Department of Human Services (DHS) is established as the agency that operates the Medicaid programs and waivers. Oregon Vocational Rehabilitation (VR) has not entered into separate agreements with OHA outside of our parent agencies agreements. VR does collaborate with the individual programs that administer the waivers.

### 2. The State agency responsible for providing services for individuals with developmental disabilities; and

VR and the Office of Department of Developmental Disability Services (ODDS) have focused their work since the 2016 State Plan submission and 2018 updates to achieve the outcomes set forth in Executive Order 13–04, which was updated in Executive Order 15–01. These Executive Orders emphasize with more clarity the state's Employment First Policy. Additionally, the State of Oregon has recently settled a lawsuit that calls for increased integrated employment opportunities for individuals with intellectual and developmental disabilities (I/DD). VR, ODDS, the Oregon Department of Education (ODE) and the I/DD service delivery system have a working relationship that shares information, leverages and braids funding, and encourages the joint case management of joint clients. Moving forward VR will continue to work with ODDS and I/DD service delivery system as well as with ODE to increase our collaboration to maximize funding, streamline processes, and meet the competitive and integrated employment goals of intellectually and developmentally disabled clients.

VR, ODE and ODDS have:

Hired staff specialists who serve individuals with I/DD. These three groups of regional staff meet regularly; co-train other agency staff; and, co-develop tools and strategies to provide services that are consistent and reflect best practices.

Have established collaborative training regarding consistency and quality in curricula used for VR, ODDS and ODE staff throughout Oregon; accomplished through: Agency conferences (VR In–

Service, ODDS Case Management Conference, and ODE Regional Transition Conferences) used mixed groups of staff and cross-training techniques to further collaborative training goals, VR, I/DD, and school transition staff training on varied topics, presented regionally to groups consisting of staff from all three agencies. Staff are consistently co–trained by specialists from the three agencies.

Ongoing and regularly scheduled meetings lead to collaborative actions by ODDS, VR and ODE. Employment First Steering Committee meetings direct the overall work of the following collaborative meetings. This committee is co–led by VR and ODDS Administrators.

Policy and Innovation meetings are co–led by VR staff and ODDS staff to facilitate these collaborative actions. The three agencies review and discuss all new or newly revised policy to assure alignment across agencies. Each agency sends policy transmittals to their regional and community staff when another of them adopts new or newly revised policy.

Education and transition meetings discuss pertinent issues for students who have transition plans including those receiving Pre–Employment Transition Services (Pre-ETS); facilitating these collaborative actions: A jointly held goal of seamless transition for students with transition plans, students in transition programs, and post high school students.

Examination of agency procedures, leading to the development of tools and strategies for use by field staff; and referral to the Policy Work Stream for potential policy revision or development. Training and technical assistance meetings address issues of staff and vendor training to facilitate.

Increased numbers of vendors shared across agencies.

Increased knowledge and skill (competency) of agency staff and vendors. Quality Assurance is a cross–agency group that evaluates collaborative outcomes providing a means to assess collaborative efforts.

### 3. The State agency responsible for providing mental health services.

A primary effort of VR and OHA Behavioral Health Programs has been development and expansion of evidence-based supported employment services by increasing the number of county mental health organizations providing such services and meeting fidelity standards. VR continues to partner with and utilize the Oregon Supported Employment Center for Excellence (OSECE) in developing and refining evidence-based supported employment services. As of the end of federal year 2019, 40 community mental health programs and 35 out of 36 counties are providing IPS services to Oregon citizens. With the inclusion into Oregon's Administrative Rules (OARs), evidence-based supported employment services Oregon.

Additionally, VR collaborates and supports the Early Assessment and Support Alliance (EASA) which is an evidence-based practice effective in reducing the early onset of and the symptoms of severe mental illness. VR works with EASA in assisting young people with early onset psychiatric disabilities by helping them obtain and maintain employment.

While continuing to expand and support employment outcomes, the quality of those outcomes, and the skills of the employment service providers, VR is looking ahead to increasing the capacity of community rehabilitation programs and providers.

### i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development

Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

#### 1. System on Personnel and Personnel Development

#### A. Qualified Personnel Needs

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

i. The number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

The Oregon Legislature has the sole authority to establish the type and number of state government positions, including Oregon Vocational Rehabilitation (VR) positions. Over the last two bienniums, the legislature approved 14 new VRC positions to help support statewide Employment First initiatives. The chart below indicates the type and number of positions allocated by the legislature for the 2017-2019 biennium and the type and number of vacancies and projected vacancies over the next five years.

VR Program (01/01/2020) Total Positions:	296
Current vacancies:	29
Projected vacancies in the next 5 years:	55
VR Counselors:	
Total positions:	135
Current vacancies:	10
Projected vacancies in the next 5 years:	31
VR Specialists:	
Total positions:	6
Current Vacancies:	1
Projected vacancies in the next 5 years:	3
Transition Network Facilitators:	
Total positions:	8
Current vacancies:	0
Projected vacancies in the next 5 years:	1
Pre ETS-Coordinators:	
Total positions:	6
Current vacancies:	3
Projected vacancies in the next 5 years:	0
Human Services Assistants/Office Assistants	
Total positions:	78
Current vacancies:	9

Projected vacancies in the next 5 years:	13
Branch Managers	
Total positions:	17
Current vacancies:	2
Projected vacancies in the next 5 years:	7
Regional Managers	
Total positions:	3
Current vacancies:	1
Projected vacancies in the next 5 years:	1

In the pool of 135 Vocational Rehabilitation Counselors (VRCs), VR has 6 VR Specialist positions. The counselors in these positions provide training, technical assistance, and caseload support to other field staff on a given area of focus, in addition to carrying a general caseload. The areas of focus include autism, deaf and hard of hearing services, intellectual and developmental disabilities, mental health, Motivational Interviewing, spinal cord injuries, traumatic brain injury, and workers' compensation.

All VR field staff are provided with the supervision necessary to ensure the delivery of quality VR services. In addition to direct supervisory practices, a minimum of 20 hours of training per VR employee per year has been established as a staff development performance benchmark. Managers meet annually with staff to address professional development needs for the upcoming year.

PY 2018: VR served: 17204 Staffing Ratio (VRC): 1:111

PY 2019: VR served: 16907 Staffing Ratio (VRC): 1:109

FFY 2020 (Projected): 18127 Staffing Ratio (Projected) (VRC): 1:117

The present and projected staffing level and configuration meet currently identified needs.

ii. The number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

Included in i.1.A.i.

iii. Projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

included in i.1.A.i

#### **B.** Personnel Development

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

### i. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

Oregon has two institutions of higher education with Council for Accreditation of Counseling and Related Educational Programs (CACREP) accredited graduate programs in Rehabilitation Counseling: Western Oregon University (WOU) and Portland State University (PSU).

WOU has two Rehabilitation Counseling degree options: The Master of Science in Rehabilitation and Mental Health Counseling for the Deaf (RCD) is one of only four deafness specialty programs in the United States and has been in place continuously since 1973; and the Master of Science in Rehabilitation and Mental Health Counseling (RMHC), which was authorized by the Oregon University System in 1991. WOU's RCD program recently moved from being an on-campus program to an online/distance learning program. This change has already significantly decreased the number of available VR counselor interns with skills and training to appropriately serve deaf, hard of hearing and deaf-blind Oregonians because students will be doing all their fieldwork in their local communities around the US.

PSU offers a Master of Science in Clinical Rehabilitation Counseling. This is a three-year program, as opposed to the two-year curriculum at WOU and other regional university programs.

Western Washington University (WWU), located in Everett, Washington, offers a hybrid oncampus/online two-year Master of Arts in Rehabilitation Counseling. Most of these students will seek internship and employment in Washington State, but Oregon VR is actively involved in recruiting interns and graduates from this program.

The University of Idaho offers a two-year program of study leading to either a Master of Education or a Master of Science in Counseling and Human Services, with an emphasis in Rehabilitation Counseling. This program is closing following graduation of its current students in May 2020.

Idaho State University (ISU) will open its two-year Master of Counseling in Clinical Rehabilitation Counseling program in both Pocatello and Meridian, Idaho beginning August 2020. Oregon VR's Internship Coordinator has already been in contact with ISU faculty expressing interest in providing internship sites in Eastern and Central Oregon when and if they have students who are interested in completing their fieldwork experiences with Oregon VR. Oregon VR will also begin sharing recruitment announcements with ISU faculty once the program opens.

Graduates of all program options described here are eligible to seek national certification from the Commission on Rehabilitation Counselor Certification (CRCC) as Certified Rehabilitation Counselors (CRCs) and/or state licensure as Licensed Professional Counselors (LPCs) by the Oregon Board of Licensed Professional Counselors and Therapists.

ii. The number of students enrolled at each of those institutions, broken down by type of program; and

Western Oregon University Current Enrollees: RMHC 20 RCD 12

Portland State University Current Enrollees: RC 41

Western Washington University Current Enrollees: RC 32

iii. The number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or

licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

Western Oregon University Graduates, 2019: RMHC 10, RCD 4 CRC/LPC upon graduation: 14

Portland State University Graduates, 2019: RC 7 CRC/LPC upon graduation: 7

University of Idaho, 2018: RC 20

Western Washington University, 2019: RC 6

### 2. Plan for Recruitment, Preparation and Retention of Qualified Personnel

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

VR continues to work closely with the graduate rehabilitation counseling programs at WOU, PSU and elsewhere in order to increase recruitment of qualified applicants to work in the field. Part of this work consists of reaching out and working with graduate programs to provide practicum and internship sites for students working their way through the program. In the 2018-19 academic year VR hosted nine interns. In the current 2019-20 academic year, Oregon VR received 28 applications for internships from students representing 7 graduate academic programs; 12 are currently placed in field offices around the state.

The VR Director's Stipend Program continued during this reporting period, providing financial support to five graduate interns during the 2018-19 academic year and is funding stipends for 12 interns during the current (2019-20) academic year. This program is designed to attract and support interns, as well as develop a rich and diverse pool of applicants for VR counselor positions in the Oregon VR program. Cooperative Agreements between VR and public universities (referred to as interagency agreements in Oregon) offering graduate degrees in Rehabilitation Counseling are developed and implemented prior to disbursement of stipend funds, which include a portion of the overhead costs for the Universities' staff administering the funds.

For the 2018–19 school year, VR expended a stipend cost of \$87,722 for five WOU students. During the current 2019-20 academic year, VR is expending \$117,486 for six WOU students, \$103,761 for five PSU students and \$10,980 for one University of Idaho student in the program. VR staff members continue to serve on Rehabilitation Counselor Education Advisory Councils for programs in the region (WWU, PSU, and WOU). An increasing number of VR managers and VR counselors are participating in the classes at the graduate level coursework and in the mock interviews conducted with students. The VR Internship Coordinator, VR managers and several VR counselors have also been invited to and have participated in the selection process for incoming students at WOU and PSU for the past two years. VR managers engage local partners in their recruitment process and are encouraged to consider the demographics of their community and client base when making hiring decisions.

#### 3. Personnel Standards

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

### A. Standards that are consistent with any national or State-approved or - recognized certification, licensing, registration, or other comparable

### requirements that apply to the profession or discipline in which such personnel are providing VR services; and

VR continues to utilize an established set of standards to evaluate and select VR counselors. These standards are based on a modified version of standards utilized by the Workers' Compensation Division (WCD). The State of Oregon's VR counselor classification is shared by WCD, the Oregon State Hospital, the Oregon Commission for the Blind, and VR. It requires that VR counselors possess:

- A Master's degree in Rehabilitation Counseling; OR
- Be certified by either the Commission on Rehabilitation Counselor Certification as a Certified Rehabilitation Counselor (CRC), or the Certification of Disability Management Specialists Commission as a Certified Disability Management Specialist D (CDMS), **and** six months full-time work experience providing vocational rehabilitation-related services; OR
- A Master's degree in psychology, counseling, or a field related to Vocational Rehabilitation (such as one that promotes the physical, psychosocial, or vocational well-being of individuals with disabilities) **and** 12 months full-time work experience providing vocational rehabilitation-related services, OR
- A Bachelor's degree in a related field, such as one that promotes the physical, psychosocial, or vocational well-being of individuals with disabilities, **and** three years of full-time work experience providing vocational rehabilitation-related services to individuals with disabilities. There is no direct experience substitute for a Bachelor's degree.

VR continues to have a goal that all employees classified as VR counselors will hold a Master's degree in Rehabilitation Counseling or a closely related field. VR will continue to seek counseling staff with Master's degrees, but VR counselor candidates with an appropriate Bachelor's degrees and related work experience may be hired.

In the past few years, VR has broadened support to staff who have attained their CRC credential through not only ensuring that all eligible training sessions are pre-approved for CRC continuing education units (CEUs), but by also paying for renewal fees and online training courses through CRCC's E-University. Additionally, staff who are eligible to apply to take the CRC examination are supported by VR covering the cost of the testing fees, preparation materials and the University of Wisconsin-Stout CRC Preparation Course (an 8-week training that is completed online). Currently, there are 67 VR staff with CRC credentials; 50 of these are practicing VR counselors, 9 are branch or regional managers stationed in the field and the remaining 8 are former VR counselors who are now working in Central Administration.

B. The establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.

VR continues to expect that all staff participate in appropriate professional development activities. This includes keeping up with the most recent advances and best practices when working with individuals with specific disabilities, staying up to date with best practices overall, and maintaining an updated understanding of the evolving labor market in their area. Relationships are being developed with Regional Economists and Workforce Analysts who are employed by the Oregon Employment Departments (OED) Research Department to ensure that staff have the information and the cross training they need to understand the labor markets in their area. VR is establishing robust relationships with Local Workforce Development Boards (LWDBs) so that VR, understands their local sector strategies, and therefore can support those efforts when working with VR clients.

#### 4. 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. 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

VR is committed to offering a comprehensive system of staff development and training. The goal is to ensure staff development for VR personnel in areas essential to the effective management of VR's program of VR services. Since the elimination of RSA's in-service training grants (including the Basic and Quality Award Grants) in 2015, VR has continued to provide the training and development of personnel necessary to improve their ability to provide VR services leading to employment outcomes for individuals with disabilities, especially those with the most significant disabilities.

In fall 2019, a survey of all VR staff was conducted to determine training needs and interests. This survey has led to the implementation and creation of a week-long Comprehensive Counselor Training program as the first response to staff members' input. The results of this evaluation will lead to further development of an updated training system.

## B. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

VR will continue with our Job Development Orientation Training (JDOT) that is provided to our job placement contractors and the Job Placement Services Contract training for our staff. These training curricula focus on a skill–based job placement process that looks at placement from a business perspective. VR will also prioritize training focused on best practices for working with specific disability populations, vocational assessment, transition, motivational interviewing practice, rehabilitation technology, assistive technology, effective case management, and understanding the labor market. VR has multiple trainings presented throughout the year that cover each section listed. VR is committed to providing continuing education units (CEUs) for each training provided, allowing for staff to maintain credentials and/or licensure easily and effectively.

VR will continue to coordinate training opportunities with other partners and partner staff. VR believes that joint trainings provide an opportunity to enhance the service delivery system, increase opportunities for better levels of partnership, and create common goals and understandings for all involved. VR is also looking internally for subject matter experts to provide information to other staff. This is to increase and secure institutional knowledge from those veterans who have been in the field. VR wants to retain the strong bases of knowledge and expand upon them for the success of all participants and the program.

VR is partnering with the Department of Human Services (DHS) Training Unit to launch a comprehensive professional development series for all members of the Leadership Team that includes executive members, regional managers, and branch managers. The sessions take place monthly and incorporate concepts of leadership, personnel and resource management, the Workforce Innovation and Opportunity Act (WIOA), and tailors all this content to the VR Program. One highlight in this series is VR's collaboration with the Center for Continuing Education in Rehabilitation (CCER),

that works out of University of Washington, to bring the CCER VR Supervisor Academy to Oregon in the spring of 2020 specifically for our Leadership Team.

#### 5. Personnel to Address Individual Communication Needs

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

VR continues to hire and retain staff capable of communicating with diverse populations. Currently,

VR has 17 staff who have passed mandatory proficiency evaluations and have demonstrated that they are bilingual in the following languages: Amharic, Farsi, Spanish, Russian, Bosnian and American Sign Language (ASL). Of these, 10 are ASL fluent or are native ASL signers. In specific geographic areas and for specific caseloads, VR engages in targeted recruiting for job applicants with specific language skills. VR staff who are not fluent in the native language of an applicant or a client have access to, and training in, the use of the eleven different contractors approved for onsite spoken language interpreting services and four onsite ASL interpreter coordination agencies; by CTS Language Link for telephone interpreting and by Voiance for on-demand video remote interpreting in both ASL and spoken languages.

In addition, the program has developed and utilizes outreach and application materials in alternate language formats, including Spanish, Vietnamese, Somali, and Russian. VR continues to contract and collaborate with the Easter Seals Connecting Communities Program in reaching out to and providing specialized job placements services to native Spanish–speaking individuals with disabilities. The focus of these services has been in Portland, Beaverton, Gresham, Clackamas, Salem, Woodburn, and Eugene, which have large Latino communities. VR continued to develop and utilize training materials in alternate formats, including new counselor training materials, to meet the accommodation needs of VR counselors who are blind or deaf. The training unit assists staff, contractors and interns who need accommodations for training events with assistive listening devices and qualified interpreters.

### 6. Coordination of Personnel Development Under the Individuals with Disabilities Education Act

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

VR, the Oregon Department of Education (ODE), and local school districts have robust relationships that include many opportunities for partnering, joint planning, and cross-training. Under the Workforce Innovation and Opportunity Act (WIOA) and the new requirement for Pre–Employment Transition Services (Pre-ETS), this relationship continues to grow. This commitment was demonstrated in 2019 when VR provided the following opportunities:

- The continuation of the series of professional development opportunity occurred. In the 2018 and 2019, VR and ODE conducted five and four regional trainings, respectfully, across the state for school staff, VR staff, community members, and providers. These trainings covered services available through VR, Individuals with Disabilities Education Act (IDEA) services in transition and identifying VR counselors for various educational districts.
- 2. VR co-funds eight regional Transition Network Facilitators (TNFs) whose role is to cross-train VR and school staff in the implementation of IDEA, WIOA, and the Executive Order 01–15.

- VR co-funds four Pre-ETS Support Specialists/TNFs whose role is to deliver Pre-ETS as well as work with school staff in the implementation of IDEA, WIOA, and the Executive Order 01– 15.
- 4. A quarterly meeting, Transition Technical Assistance Network (TTAN), occurs with the Youth Transition Program (YTP) Coordinator, the Pre-ETS Program Coordinator, Pre-ETS Coordinators, Pre-ETS Support Specialists, TNFs along with Office of Developmental Disability Services (ODDS) Employment Specialists to discuss group plans occurring with students, educators, developmental disability services, and VR.
  - a. Regional Job Clubs were expanded around the state.
  - b. A Student Summit was piloted.
  - c. Reverse Job Fairs began development.
- 5. VR staff sit on ODE's State Advisory Committee for Special Education (SACSE) to coordinate services, provide trainings, and policy guidance with respect to special education and related services for children with disabilities in the state.
- 6. VR staff sit on ODE's Advisory Committee on Transition (ACT) in an advisory capacity on issues related to determining transition priorities for documents, web information and development and other issues that may arise. The ACT considers the services and post-secondary outcomes for students and informs the department on strategies and plans to improve transition for students beginning at age 14 and continuing through age 21. During 2019, the <u>Planning My Way to Work</u> booklet was updated by ACT.
- 7. VR staff participate with the National Technical Assistance on Transition (NTACT) with Oregon's State Plan. This is a collaborative team including educational staff to assist with positive outcomes for students.
- 8. VR has a contract with the University of Oregon to provide technical assistance to VR and school staff in the implementation of YTP. This contract funds five regional Technical Assistance Providers who coordinate services and develop best practices in collaboration between VR and schools including IDEA funded services.

#### j. Statewide Assessment

1. Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:

### A. With the most significant disabilities, including their need for supported employment services;

Oregon Vocational Rehabilitation (VR) completed the 2017 Statewide Comprehensive Needs Assessment (CSNA) in September 2017. It updated the CSNA concluded in 2013. The Program has initiated the process for the next CSNA in November 2019. It will be completed in September 2020. This information will be utilized for the Program's 2020 State Plan update. The CSNA in process will not include the Oregon Commission for the Blind (OCB), as they have developed and completed their own CSNA.

Federal Fiscal Year (FFY) 2017, VR staff, Statewide Independent Living Council staff, State Rehabilitation Council (SRC) members, and OCB staff formed a committee that collaborated with and monitored the implementation of the contractor, Program Policy Institute (PPI), to develop a comprehensive assessment of the vocational rehabilitation needs of persons with disabilities residing in Oregon. PPI administered the assessment, gathered and analyzed the results and provided VR, the SRC and OCB with written and in-person reports on its findings. Separate CSNA reports were provided to VR and OCB. Efforts were made to incorporate the Workforce Innovation and Opportunity Act (WIOA) expectations and expand the assessment to better report the needs of students with disabilities in transition.

The results and findings from the 2017 CSNA are summarized below. The findings will be considered and addressed by VR and the SRC as they review, update and refine VR's goals, priorities, strategies and activities. Additional new information is included in this State Plan that came about since the completion of the 2017 CSNA.

The complete assessment and appendices of data for both the VR and OCB reports can be found at:

http://www.oregon.gov/DHS/EMPLOYMENT/VR/Pages/Data-Publications.aspx.

The 2017 needs assessment was built around basic research questions:

- 1. What does the VR/OCB target population look like?
- 2. What are the primary barriers to employment for VR/OCB clients, and/or what are their service needs?
- 3. How can VR/OCB services best support client efforts to achieve positive employment outcomes?

The strategies employed four primary data-gathering approaches to conduct the needs assessment. These involved:

**A review of extant data** to assess the prevalence of disability, the employment status of people with disabilities, and the characteristics of Oregonians and VR/OCB clients with disabilities. National surveys, state-level data, VR and OCB client data were reviewed. Additional background and context information was gathered from:

- Vocational rehabilitation needs assessments or reports from other states;
- Relevant national surveys and reports at the state and national levels relating to persons with disabilities and employment; and,
- Relevant articles in academic literature.

**Key stakeholder interviews** that offered the opportunity to gain an in- depth understanding of the strengths and needs associated with vocational rehabilitation service delivery and outcomes according to OVR/OCB clients and people working in the field. A total of 32 key stakeholders interviewed included:

- People with disabilities;
- VR/OCB staff;
- Partner agency staff, providers, and job developers;
- Representatives of advocacy groups;
- Nonprofit partners; and
- Secondary and post- secondary education providers.

**Focus groups** provided the opportunity to have meaningful conversations about vocational rehabilitation strengths and needs with four different categories of respondents:

- VR/OCB staff;
- Agency partners, providers and employers;

- Current or former VR/OCB clients; and
- Students with disabilities in transition from high school.

Staff and partner agencies were asked to extend focus group invitations to individuals with disabilities who may be under or unserved by vocational rehabilitation program to elicit feedback from these individuals. Focus groups were conducted in five regions of the state to assure regional variation. Two additional focus groups were for Oregon students with disabilities in transition participating in summer work experience programs.

**Electronic surveys** collected data from VR/OCB staff, community partners, participants and employers who hire people with disabilities. Considerable time was devoted to refining the instruments to be used for each of the surveys. Invitations to participate in the survey included email invitations to:

- All VR and OCB staff
- Community partners from lists generated by members of the SRC, and VR, OCB and the Oregon Statewide Independent Living Council staff.
- More than 10,000 unduplicated current participants and those served in the last year by VR or OCB.

More than 1,600 employers identified as providing employment to persons with disabilities associated with VR were invited to participate via postcards with an electronic link to the survey. OCB provided email addresses for employers who hired persons with disabilities.

For the duration that surveys were accepted, VR placed links for each group on the VR public facing website for public participation. The survey allowed participation through screen reading technology.

A total of 1,203 surveys were completed. Thirteen individuals requested and completed the survey over the telephone. Of these surveys, 5% of the respondents identified as blind, 7% identified as having a most significant disability, 7% self-identified as youth (aged 16-21), and 15% self-identified as a minority ethnicity or race.

The approach was designed to capture input from a variety of perspectives in order to acquire a sense of the multifaceted needs of persons with disabilities in the state while assisting both the VR and OCB programs to comprehensively assess needs within the state for persons with disabilities and employment. Responses to the individual survey reflect the opinions of current and former clients of VR including individuals who had not yet developed a rehabilitation plan, individuals with active rehabilitation plans, and individuals whose cases had been closed. Efforts were made to gather information pertinent to un-served and under-served populations through inquiries with individuals who serve a broad range of persons with disabilities in the state (whether they are affiliated with VR or not). Likewise, VR and OCB staff members that participated in key stakeholder interviews, focus groups and electronic surveys serve individuals with disabilities representing a broad range of backgrounds and experiences and from businesses reflecting the opinions of employers representing a variety of industries

For this analysis, a finding that is significant at the 0.05 level means that the difference in the number of people reporting a need and/or receipt of services across subgroups is likely to be due to true underlying difference across subgroups, rather than chance, 95% of the time.

In ten out of 18 barrier categories, people with significant disabilities reported the barrier significantly more frequently compared to VR participants in general. People with significant disabilities were significantly more likely to experience the following barriers:

- Employer attitudes towards people with disabilities;
- Concern over loss of benefits;
- Limited relevant job skills;

- Lack of information regarding disability resources;
- Lack of long-term services and ongoing job coaching;
- Lack of transportation;
- Cultural/family attitudes towards employment for people with disabilities;
- Lack of assistive technology;
- Lack of physical accessibility; and
- Lack of personal care attendants.

Moreover, across key target populations, individuals with significant disabilities cited the greatest difference in barriers compared to the general vocational rehabilitation population for lack of assistive technology (24% difference). In addition, survey respondents with significant disabilities were significantly more likely to identify a need for the following services, compared to the rest of the participant respondents:

- Technical training;
- Academic education;
- Vocational tuition;
- Durable medical equipment;
- Orientation and mobility services;
- Speech to text support or ASL interpreting;
- Family and caregiver support;
- Medical care;
- Social security benefit planning; and
- Cognitive therapy.

Program staff and community partners noted that people with significant disabilities require more intensive services, such as more coaching, more repetition, and more time to feel comfortable in new environments. Stakeholder feedback suggests that these individuals may have mental health, communication, and physical limitations, and are often relegated to more menial, less stimulating employment opportunities.

Yet the responsibility for providing needed services to people with significant disabilities is often unclear. Program staff and partners commented that there is a sense in the field that the job developers can do these activities, and indeed some job developers are performing daily living activities. However, others noted that they are not trained in personal care, and that these tasks are the responsibility of personal care assistants. Yet some personal care assistants may not be sure of their role in these tasks while a person is employed and may limit their services while the participant is on the job. Ambiguity around the delegation for these services can hinder access and delivery of services to these individuals.

Additionally, program staff and partners observed that individuals who work with participants with intellectual and developmental disabilities (I/DD) typically need more specialized training. Program staff and partners had mixed feedback on the capacity to serve these individuals within the existing infrastructure. Some staff and partners lauded the offices who had I/DD specialists on staff. Others felt that increased I/DD training across all counselors and providers would better serve program participants since no one specialist can serve all individuals with I/DD in any given region. Stakeholders cited that certain relationships, such as a partnership with the Office of

Development Disabilities Services (ODDS), can provide braided funding that supports longer-term services. In some cases, employers may be more willing to work with these individuals due to stable funding and assistance.

In addition to individuals with I/DD, program staff and partners also noted the challenge in adequately serving individuals with brain injury, or those on the border of I/DD diagnosis. These individuals often require the same intensive, long term services that those with I/DD do, but they do not have access to the same long-term funding streams and supports.

Program staff and community partners also cited additional target populations of people with disabilities who face unique challenges of their own:

- Individuals who experience blindness and individuals who experience deafness or hearing impairment face related challenges of a low-incidence disability with high assistive technology needs. Staff commented that certain resources, including a deaf VR counselor in Washington, have been useful resources to VR staff.
- Veterans also face unique challenges, though program staff observed that they have their own veterans' supported employment program, so interaction with traditional vocational rehabilitation services varies.
- Finally, individuals who experience Autism Spectrum Disorder can present unique challenges. Many individuals may perform too well on adaptive tests which makes them ineligible for services, however, sustained limited executive functioning and related cognitive issues make it difficult for these individuals to navigate without assistance.

#### B. Who are minorities;

In five out of 18 barrier categories, people with disabilities from racial or ethnic minority groups reported the barrier significantly more frequently compared to VR participants in general. People with disabilities who were minority were more likely to experience the following barriers:

- Employer attitudes towards people with disabilities;
- Limited relevant job skills;
- Convictions for criminal offense or other legal issues; and
- Lack of affordable childcare.

In addition, survey respondents with disabilities from minority groups were significantly more likely to identify a need for the following services, compared to the rest of the participant respondents:

- Family and caregiver support;
- Independent living skills training;
- Transition services from high school to adult services; and
- Transition services from institution to community.

Program staff and community providers remarked that the broader context of racial and ethnic equity impacts access and service delivery for individuals with disabilities from racial, ethnic, or cultural minority groups. One program staff member reflected that the systemic interaction of race and economy has implications for both services and job opportunities, which may not be as available in lower income, often minority neighborhoods. Program staff also described ongoing work, especially in the Portland region, to provide better outreach and accessibility to racially diverse participants and discussed ongoing agency efforts to ensure cultural awareness as a tenet of service delivery. They also noted visible welcoming material for the Lesbian, Gay, Bisexual, Transgender, and Queer (LGBTQ) community.

To increase access and service provision for individuals from racial and cultural minority groups, program staff suggested enhanced efforts to recruit persons of color and diverse ethnicities and sexual orientations into education programs that prepare them to serve as VR counselors.

Another program partner described an initiative aimed to increase multicultural, multilingual access to services. The Connecting Communities program, a partnership between VR and Easter Seals, was designed to facilitate greater access and service provision. In this model, Connecting Communities staff are paired with a VR counselor. The program provides specialized instruction such as English for the workplace, cultural differences in the workplace, English as a Second Language, workplace readiness, and on-the-job skills. They also facilitate placement, particularly in Latino firms looking for Latino workers, or non-Latino firms interested in increasing their diversity.

Similar to working with youth in transition, many program stakeholders noted the need to educate families about service and employment opportunities for their family member with a disability. Program staff and partners indicated that many cultures may not have expectations that individuals with disabilities can work, so there is a persistent cultural barrier to seeking services and employment. Language barriers within these communities may also exacerbate access issues, especially during the multi-step enrollment process. Program staff noted limited availability to adequately serve non-English speakers, and described efforts to work with partner organizations, such as the Immigrant and Refugee Community Organization, to increase outreach and access.

#### C. Who have been unserved or underserved by the VR program;

According to our monthly rolling reports, our data tells us that all population groups are being served proportionally.

Program staff and community partner survey respondents were asked to identify which individuals they consider to be primarily unserved or underserved populations. People who live in rural areas of the state, people who have criminal convictions, and people with a mental health condition were three responses identified by the greatest share of both program staff and partners. More than half (56%) of community respondents also felt that people with substance use disorder are likely to be under or unserved.

Program staff and community partners were also asked to identify strategies to serve under and unserved populations. Increased staff was the strategy identified by the greatest share of program staff (63%), and increased transportation options was identified by the greatest share of community partners (63%). More interactions with the community and providing more job skills development training were identified as strategies to serve unserved populations by the majority of both program staff and community partners. Almost half of all staff (48%) and 57% of community partners felt that staff training to work on specialty caseloads would help serve under and unserved participants. More than half of community partner respondents also cited improving interagency collaboration and public awareness campaign key strategies for serving under or unserved populations.

#### Underserved and Unserved Youth with Disabilities

Despite the many strengths of Oregon's youth transition work, some youth are underserved or fall through the cracks. A quarter (25%, or 18) of VR staff and a third (33%, or 31) of VR community partners felt that people between the ages of 16 to 21 are underserved by vocational rehabilitation services. Interviewees discussed varying reasons for this. Some students do not choose to participate in transition services while in school, do not have a YTP program available to them, or do not have a disability focused on by their school's transition services. If those students take a break between school and connecting to vocational rehabilitation services, they have often lost and need to be retaught the structures, routines and soft skills obtained through school attendance. Sometimes the gap between graduation and VR participation is not a student's choice, but rather the result of high VR caseloads causing backlogs. Stakeholders suggest increased collaboration with programs serving out of school youth to improve outcomes for this population.

Additionally, some staff expressed a desire to be involved with students earlier in their school careers, and to have more communication including increased involvement at individualized education program (IEP) meetings.

Interviewees and focus group participants discussed limited connection between contracted job developers and students in transition seeking employment. Some stakeholders discussed this as an educator's or a youth transition program counselor's responsibility. Participating contractors were looking for guidance in how to formally provide services to this population.

### D. Who have been served through other components of the statewide workforce development system; and

Analysis across data sources revealed consensus around service system infrastructure strengths and opportunities for improvement. The findings and recommendations articulated throughout the report are based on stakeholder feedback and suggestions.

Feedback on Contracted Vendor Relationships

- Contracts. Stakeholders discussed limitations to existing job developer contracts and suggested exploring an alternate contracting approach or pay structure to increase capacity.
- Capacity. There are waiting lists for job developers and job coaches because of limited contracted vendor resources in some areas, and/or underuse of existing resources. Stakeholders recommended implementing an approach to improve VR counselor knowledge of job developer capacity/availability.
- Training. Contractor training was generally viewed as ineffective to job development or job coaching. Stakeholders suggested implementing effective training based on the best practices of other states. In response to what we have heard from the staff, stakeholders and contractors, the Job Development Contract has evolved to reflect the input from these parties. Amendments are being developed for the future contract renewal, a Job Development Contract training for VR Staff has been created and implemented and adjustment to Tier Rates have been completed. Employer Perceptions of Barriers to Employment.
- Stakeholders felt employer concerns about liability, potential lawsuits for discrimination, accommodation costs, and slow system responsiveness were barriers to employment.
- Employers also remarked on barriers related to qualified applicants, employer/co-worker perceptions, training, and communication.
- Stakeholders recommended increased collaboration between VR and employers to facilitate dialog around these issues.
- Limited VR counselor and job developer capacity has hindered relationship-building with employers. Counselors and job developers do not have sufficient opportunity to network with local businesses to understand their needs and develop an understanding among employers of the value of people with disabilities in the workplace and community. Increasing outreach and education efforts could benefit participants and employers.
- Employers that work with VR generally felt positive about their experiences. Almost 90% of surveyed employers said they had a satisfactory or very satisfactory experience. Employer survey respondents were asked whether they actively recruited or employed people with disabilities in the last year. In general, businesses were more likely to hire than to recruit people with disabilities (76% of respondents employed a person with a disability in the last year; 40% actively recruited). When analyzed by size, large businesses were the most likely to actively recruit people with disabilities. Half or greater of all business sizes represented by survey respondents had employed a person with a disability in the last year; percentages represented by businesses with 51 to 250 employees (94%) and businesses

larger than 1,000 employees (88%). (Percentages are calculated based on the number of businesses in each size category.)

- Staff, partners, and participants suggested that increased presentations to regional employers and peer to peer presentations by employers who have hired people with disabilities and by the employees with disabilities themselves could help normalize hiring people with disabilities. Participants also recommended creating a safe space for employers or the public to ask questions as an opportunity to increase conversations and lead to more awareness and acceptance.
- Stakeholders additionally discussed how Oregon government agencies could better serve as model employers. Government is one of the largest employers in the state. Several community partners and VR staff recommended more proactive attempts by government to increase employment of people with disabilities within the system, as well as development of a policy task force or business advisory board to help develop infrastructure around employer outreach and engagement.

Feedback on Community Partner Relationships

- Communication. Stakeholders felt communication with community partners was lacking.
- Primary partnerships. Participants most commonly work with mental health, I/DD, education, and aging and disability providers (in addition to WorkSource).
- Individual Placement and Support. The Individual Placement and Support (IPS) model used with people with mental illness is cited as a best practice, which has supported effective partnership between VR and mental health providers.
- Employment First. The Employment First initiative has facilitated increased collaboration between VR, the education system, and I/DD providers to support people with I/DD in finding employment.
- I/DD system collaboration challenges. Collaboration with I/DD system partners has improved, but stakeholder proposed opportunities to address ongoing challenges, including reconciling Employment First and individual choice, sheltered workshop closures and limited employment pathway options, discovery requirements, and contract differences.

Feedback on WorkSource Relationships

- WIOA has required additional collaboration with the broader Oregon workforce system. local leadership teams, including VR, are working on how to connect more people to workforce services throughout the health and human services infrastructure. VR is getting additional referrals as a result of WIOA collaboration.
- Referrals. Many VR participants are referred to WorkSource, primarily for job preparation workshops/services and job search/referral assistance.
- Additional WorkSource services discussed for referral included iMatchSkills, job club, on the job training, training with Rescare Academy, trainoregon.org, targeted job leads, and unemployment insurance. Job preparation workshops or services and job search or referral activities are the most commonly referred to and seen as the most helpful. Labor market information and research received mixed reviews of usefulness, and other services were rated more poorly.
- Accessibility. WorkSource services are perceived as less accessible to people with disabilities and accommodations are seen as lacking. Stakeholders suggested training for WorkSource on accessibility and that WorkSource ensure systems, resources, and technology are accessible for people with disabilities. (More specific information can be found on pages 124-125 of the CSNA.)

- Participant survey respondents had mixed reviews of WorkSource Oregon. Half who have used WorkSource (226) found their services somewhat helpful. Almost a quarter (23%, or 103) found them not at all helpful, and just over a quarter (28%, or 127) found them very helpful.
- Collaboration. VR and WorkSource are working to make the relationship more collaborative, viewing individuals using both agencies' services as shared participants, rather than referring and dropping participants across agency silo borders.

Feedback on Education Relationships

- The Oregon Department of Education (ODE) is another central partner in Employment First partnerships. WIOA is also creating changes in transition service delivery for students with disabilities through Pre-Employment Transition Services (Pre-ETS). A subsequent section discusses the youth transition service system in depth.
- VR works closely with Oregon's community colleges on transition and service coordination issues. Additionally, community colleges help to train VR service providers (job developers and coaches). VR is also working with community colleges as a part of WIOA to increase opportunities for people with disabilities to gain skills and credentials. Participant focus group attendees discussed taking classes and participating in clubs and business development centers at local community colleges, and how well their VR counselors worked with the colleges to support their participation.

A new MOU is in place as of November 2019 with VR, OCB and ODE.

Feedback on Self-Sufficiency Office

- Oregon's Self-Sufficiency Programs (SSP) connect individuals to food benefits (Supplemental Nutritional Assistance Program or SNAP), Temporary Assistance for Needy Families (TANF) cash benefits, childcare assistance, and refugee services. People with disabilities can also access food and nutrition services through their local Seniors and People with Disabilities Program, which is often an Aging and People with Disabilities (APD) program.
- Almost 10% of participant survey respondents said they work with SSP, and a third of staff surveyed felt this partnership needed to be strengthened. Program stakeholders noted the importance of partnerships that can address participants' basic underlying needs, such as food and shelter. Interviewees and focus group participants did not discuss SSP partnerships at length, with one counselor referring to participants not needing to bring paperwork with them if they have a file with SSP, suggesting some level of data sharing.

Feedback on Other Infrastructure Programs

- OCB, which shares job developers with VR in Eastern Oregon and collaborates on some participant cases.
- Tribal VR programs, which are grant funded and serve federally recognized Native Americans. Participants can work with state or one of the five specialized Tribal VR programs.
- Benefits counselors provide benefits planning to participants, so they understand the rules about Social Security benefits and employment.
- Transportation providers, including public and private options and are leveraged by participants as a vital supportive service.
- Access Technologies, Inc. provides assistive technology assessments, risk assessments, and assistive technology trainings for VR participants.
- Immigrant and Refugee Community Organization is an organization through which VR conducts outreach to refugees and immigrants.

• Hospitals provide physical capacity evaluations and other medical information to VR.

## E. Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

VR primarily serves working age adults (18 to 64). Almost 20% (18.5%, or 3,042) of VR's 2016 participants were 21 or younger. This is primarily comprised of youth ages 18 to 21 (16% of the caseload, or 2,596). Less than three percent of VR's caseload is youth ages 14 to 17.

Almost 15,000 students with disabilities ages 16 to 21 receive special education services through the Individuals with Disabilities Education Act (IDEA) in Oregon public schools. If one assumes that discrete students are receiving special education and 504 plan accommodations, a total of 20,648 students with disabilities (14,799 in special education plus 5,849 with 504 plans) may be eligible for VR services.

Youth participants responding to the CSNA survey generally felt they received needed Pre-ETS, with at least half of participants reporting a Pre-ETS need also reporting service receipt. Job exploration counseling, in particular, was reported as both a high need and well-received service.

Youth in transition were significantly less likely to report a barrier to employment in four barrier categories. In no barrier category did youth and transition report a barrier significantly more frequently than the rest of the VR participant survey respondents. Youth in transition were significantly less likely to experience the following barriers:

- Employer attitudes towards people with disabilities;
- Limited relevant job skills;
- Cultural/family attitudes towards employment for people with disabilities; and
- Convictions for criminal offenses or other legal issues.

Despite reportedly fewer barriers to employment, youth in transition survey respondents were significantly more likely to identify several service needs, compared to the rest of the participant respondents. This may in part reflect youth in transition's age and limited established resources and supports compared to older participants:

- Self-employment supports;
- Orientation and mobility services;
- Speech to text support or ASL interpreting;
- Family and caregiver support;
- Group and peer support;
- Housing;
- Independent living skills training;
- Medical care;
- Social security benefit planning;
- Transition services from high school to adult services;
- Transition services from institution to community;
- Transportation; and

• Behavioral supports.

To best serve students with disabilities transitioning from high school, program stakeholders noted that educating the family is as important as educating the student. Stakeholders indicated that some families may view their child's trajectory from a deficit-based framework and may not expect their child to ever be able work. One program partner noted that society has not historically asked children with disabilities to plan for future or vocational engagement, and this may be reflected in teacher and parent expectations. Stakeholder input suggests that families can use greater education to develop appropriate program and outcome expectations and learn how to best support their child as they transition from high school.

Program stakeholders also observed a need for soft skills and job readiness training for youth. Program staff and partners recognized schools with YTP as better preparing students with disabilities for employment and vocational rehabilitation services, particularly in terms of vocational awareness, soft skill development, work experiences, and transition competency. YTP services are provided by a collaborative team including a transition specialist, a VR counselor, special educator, administrator, youth, and their families. Participating students receive pre-employment transition supports to address individualized transition needs generally during the last two years of high schools and continuing into the early transition years after leaving high school. More details on the YTP program is included below.

Despite positive feedback on YTP services, some eligible students are not served by YTP: some schools do not have YTP programs; some students or parents choose to not participate; and some schools identify students too late in the year to participate based on VR capacity to serve the students. Even in regions with YTP, stakeholders remarked that the quality of the program varies across school districts.

Additionally, students who drop out of school cannot take advantage of YTP programs. Program stakeholders noted a need to identify youth with disabilities who have dropped out of school and cannot be reached by existing transition services. Identifying these youths before they cycle into the VR system as adults can support improved vocational outcomes and system navigation skills.

Additional services for youth in transition include access to transition network facilitators, preemployment transition coordinators, and a variety of collaborations with partners to provide work experience, summer academies, benefits planning, self-advocacy skills, and mental health services. The growing infrastructure for youth in transition is described in more details in the subsequent chapter.

Despite a growing service network for youth in transition, program stakeholders also note that they may place undue expectations on youth in transition that are not commensurate with analogous expectations for youth without disabilities.

Additionally, the limited VR time frame affects progress. Some staff expressed a desire to be involved with students earlier in their school careers, and to have more communication including increased involvement at individualized education plan (IEP) meetings. Finally, program staff and partners discussed the limited or nonexistent connection between contracted job developers and students in transition seeking employment. Some stakeholders discussed this as an educator's or a youth transition program counselor's responsibility. Participating contractors were looking for guidance in how to formally provide services to this population.

### 2. Identify the need to establish, develop, or improve community rehabilitation programs within the State; and

Participant survey respondents were asked to indicate which VR partners they receive services from. Almost half did not work with listed community partners. The most commonly identified partner was WorkSource Oregon, following by community mental health programs, ODDS, and APD services. Surveyed VR staff were asked to select up to three community partners with whom VR has the strongest relationships as well as three whose relationship needs improvement. The figure below shows responses ordered by perception of partnership strength, highest to lowest. The three partnerships seen as strongest are 1) VR contracted vendors; 2) ODDS; and 3) community mental health programs. Staff noted a wide array of partnerships needing improvement, with local businesses and employers, SSP, employment department, and parole and probation department topping the list.

Community partners observed an increasing emphasis by VR on working as part of a broader team, including individuals with disabilities, families, schools, employers, and other service providers. Stakeholders particularly noted increasing teamwork and associated positive outcomes around youth transition, Employment First, and WIOA initiatives.

Staff and partner survey respondents were also asked why the vocational needs of people with disabilities were unmet by service providers. The most common responses by staff were a deficit of providers, lacking provider skillsets for specific disabilities, too few provider staff, and a burdensome VR contracting process. Community partners agreed with these as the top four reasons but thought not enough providers available in the area and lacking skillsets less important than did VR staff.

Addressing confounding service needs requires strong relationships with referral organizations, and clear communication between VR counselors and clients regarding the appropriate resource to address different needs. Nearly 70% of staff and 90% of partners felt that some or most/all individuals needed referrals to community partners. Sixty (60) percent of individuals identified this need. Half of VR staff felt that this service was received by some or most/all of the individuals who need it, compared to nearly 80% of program partners. Just over half (52%) of participants who reported this need indicated receipt.

Increasing connections with community partners and supporting the ability of partners to serve people with disabilities may create more capacity in the broader service system. These partner agencies may assist people with disabilities to receive services addressing stability and self-sufficiency needs outside of, in addition to, VR. Issues around information sharing and accessibility would need to be addressed to make these partnerships effective.

# 3. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act

Youth Transition Program

Oregon's YTP, was established in 1990 and is jointly implemented by VR, ODE, UO, and local school districts. YTP exists in 120 school districts and over 200 schools, consortia of districts, and ESDs in Oregon. YTP's goals are to improve post-school transition outcomes for youth with disabilities as well as to increase Oregon schools' capacity to collaboratively provide transition services and supports. Schools are funded every two years through a competitive grant process and use performance-based contracts linked to key milestones in the VR system – application to VR, development of an individual plan for employment, and engagement in employment, training, or a combination of the two upon exiting YTP. All YTP participants who receive core services must be eligible for VR services and become VR participants.

Participating students receive pre-employment transition supports to address individualized transition needs generally during the last two years of high school and continuing into the early transition years after leaving high school. Core services include:

• Individualized planning focused on post-school goals and self-determination and help to coordinate school plans with relevant community agencies.

- Instruction in academic, vocational, independent living, and personal social skills and help to stay in and complete high school.
- Career development services including goal setting, career exploration, job search skills, and self-advocacy.
- Paid employment including connections to local employers, on the job assessments, placement, and training.
- Support services such as individualized mentoring and support or referrals for additional specific interventions.
- Follow up support for one year after leaving the program to assist in maintaining positive outcomes in employment or post-secondary settings.

	FY 2016	FY 2017	FY 2018
Number of Youth Served	1,188	1,851	1,851
Individualized Employment Plans Developed	1,051	1,088	1,041
Percent Exiting School Employed and/or Enrolled in Post-secondary School	80%	80%	75%
Percent Exiting School with Jobs	66%	62%	63%
Average Hours of Work per Week on Exit	25	26	28
Average Wage (\$ per hour) on Exit	\$14.00	\$10.00	\$11.00
% with Jobs 12 Months After Completing YTP	64%	68%	63%
Average Hours of Work per Week 12 Months Post Exit	30	29	29
Average Wage (\$ per hour) 12 Months Post Exit	\$11.00	\$11.00	\$12.00
% in Post-secondary Training or Education	16%	15%	18%
Average Hours of Work per Week Enrolled 12 Months Post Exit	26	23	23

Source: Oregon State Rehabilitation Council, Annual Reports

**Transition Network Facilitators** 

VR and ODE operate a cooperative agreement to blend funding for nine regional Transition Network Facilitators (TNFs) as a part of the settlement of the Lane v. Brown lawsuit and the resulting Governor's Executive Order 15-01 to improve Oregon's systems providing employment services for students with disabilities. Transition network facilitators collaborate with VR and schools as well as local businesses/employers and others to implement WIOA and Employment First goals of improving transition outcomes for youth. TNFs are working to create an equitable, sustainable, simplified system, aligned across agencies that reduces redundancies.

Interviewees spoke of their role as helping to support students, teachers, families and districts by providing support and information about life after school for people with disabilities. Facilitators connect students to the Office of Developmental Disability Services (ODDS), VR, Social Security, and other services that can help to create a seamless transition from school to adulthood. Facilitators work more at a systems level than on an individual level. However, facilitators spoke about doing more with schools that do not have YTP grants or specialists.

Five percent (26 of 396) of VR participant survey respondents have worked with a TNF. This small percentage makes sense because this is a relatively new role in Oregon, and one that works more with programs than with individual students.

VR is making additional investments in Pre-Employment Transition Services (Pre-ETS) through the following partnerships:

- Silver Falls Came LEAD (Leadership Empowerment Advocacy Development). Students with disabilities participate in leadership academies, focused on job exploration, work-based learning experiences, post-secondary education counseling, workplace readiness training, and self-advocacy instruction.
- AntFarm. VR partners with AntFarm to provide work experiences in gardening and farming.
- Worksystems, Inc. Students receive work experiences in Washington and Multnomah counties with public and private employers.
- Motivational Enhancement Group Intervention (MEGI). Students gain self-advocacy skills, build self-determination and self-efficacy through a 12-session group intervention that utilizes a collaborative, goal-oriented style of communication.
- Benefits planning. YTP students are referred by schools to VR's Work Incentives Network to help make informed financial decisions about benefits and employment.
- Project Access. Five Lane County high schools, VR, and UO have been working on Project Access to see if students benefit from transition activities starting earlier in school.

Other Transition Programs

- Deaf and Hard of Hearing Youth Transition. PepNet networking meets monthly with representatives from VR, Education, Western Oregon University, parents, and regional educational service district (ESD) programs and service providers to facilitate responses to the transition needs of deaf and hard of hearing youth statewide. Teachers can attend transition training and networking events to learn how to create their own local model.
- Early Assessment and Support Alliance. VR collaborates with the Early Assessment and Support Alliance (EASA), a statewide effort to provide systematic early psychosis interventions at mental health centers to assist young people with psychiatric disabilities in obtaining or maintaining employment. VR worked with Addictions and Mental Health and Portland State University (PSU) to create a center of excellence providing ongoing technical assistance to statewide EASA programs. Vocational rehabilitation funded four county pilot sites to identify a best practices model to engage youth experiencing a first psychotic episode in accessing VR and local workforce programs.
- Seamless Transition Project. A few organizations are piloting a seamless transition project targeting youth. Similar to Project SEARCH from Cincinnati Community Health, it is a series of rotating internships provided by host businesses to prepare youth with disabilities for employment.

• Summer Assessment Academy. This eight-week summer program for students in transition helps them to identify jobs in the community they are interested in and get paid work experience. Students also participate in a job club and work with an individual counselor.

Feedback on Students in Transition Service System

- Youth Transition Program. YTP has been in place since 1990 and is seen by many as a national best practice, particularly for its success in engaging schools with VR services.
- Pre-Employment Transition Services. VR is working with schools to implement Pre-ETS as defined by the WIOA. YTP is a primary mechanism used to provide these services.
- Transition Network Facilitators. TNFs support collaboration and transition goals associated with Employment First and WIOA initiatives, as a part of the Lane v. Brown settlement agreement.
- Underserved Youth. Despite progress and success, some youth continue to be underserved or unserved. Some do not connect to transition activities or have a break between high school and VR, which weakens their soft skills built through school participation.

In summary, the CSNA is the result of a cooperative effort between VR, OCB, and the SRC. These efforts solicited information concerning the needs of persons with disabilities from persons with disabilities, service providers, VR and OCB staff, and businesses for the purpose of providing VR, OCB and the SRC with information to address structure and resource demands. The needs assessment effort is based upon the contributions of more than 1,000 individuals representing diverse stakeholder groups. VR, OCB, and the SRC will use this information in a strategic manner that results in provision of VR services designed to address the current and future needs of individuals with disabilities who seek employment.

### k. Annual Estimates

Describe:

### 1. The number of individuals in the State who are eligible for services

According to the 2018 American Community Survey, among the 2,551,993 individuals between the age of 18 and 64 living in Oregon, a total of 295,114 experience disabilities.

### 2. The number of eligible individuals who will receive services under:

#### A. The VR Program;

It is projected that Oregon VR Program will serve 18,127 in FFY 2020.

#### B. The Supported Employment Program; and

Oregon VR's Title VI, Supported Employment Funds are \$300,000 for FFY 2020. At a current cost per case of approximately \$2,504, we will be able provide services to approximately 104 supported employment clients using these funds. The number of individuals receiving supported employment services is much larger than this number and is supplemented with Title I funds.

Of the 18,127 clients projected to receive services in FFY 2020, it is projected that 3,184 will be receiving supported employment services.

#### C. Each priority category, if under an order of selection.

Oregon VR Program is not under an Order of Selection.

#### 3. The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

Oregon VR Program is not under an Order of Selection.

#### 4. The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

It is projected the Oregon VR Program will spend \$28,000,000 on eligible individuals.

#### I. State Goals and Priorities

The designated State unit must:

1. Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions

Oregon Vocational Rehabilitation (VR) and the State Rehabilitation Council (SRC) have had opportunities over the last year to work together on several aspects of the VR program, policies, procedures, and service delivery. Additionally, VR and SRC worked to jointly develop our state's goals, priorities and strategies looking forward. The SRC approved the final draft of the VR portion of Section 6 of the 2020 Combined State Plan.

### 2. Identify the goals and priorities in carrying out the VR and Supported Employment programs

When VR created its portion of the initial Unified State Plan (2016, updated in 2018) as a result of the implementation of the Workforce Innovation and Opportunity Act (WIOA), a significant amount of activity took place with workforce partners, stakeholders and staff to identify the goals identified below. The Program will continue to work towards these goals but will now be aligning our activities with the "Imperatives" identified by the State Workforce Board, (known in Oregon as the Workforce Talent Development Board or WTDB). The goals and priorities and the strategies below continue to be the VR program goals. Strategies are influenced and informed by the WTDB" Imperatives". In addition to working toward the goals and strategies set forth for the entire Oregon workforce development system in the earlier sections of the Combined Plan, listed below are the VR program specific goals, priorities, and strategies.

VR Goals/Priorities/Strategies:

1. Increase quality employment outcomes for all Oregonians with disabilities

WTDB Imperative #1, "Create a culture of equitable prosperity", calls for the increased participation of all groups and an increase in upward mobility within the workforce of Oregon. VR is the mechanism to assist Oregonians with disabilities to participate in the workforce system to achieve these objectives.

a. Support and accelerate the customer experience to be empowering, effective, and efficient.

i. Promote earlier engagement with workforce partners for VR clients in the application process.

ii. Streamline referral and data collection from common referral agencies.

iii. Work with VR staff to streamline the Individual Plan for Employment (IPE) process in order to get clients into plan more quickly.

iv. Use data to determine success rate of specific services and focus on their duplication.

b. Continue implementation of inclusive and dynamic statewide student and youth programs that meet the community needs.

i. Develop a meaningful presence in all high school districts in Oregon.

ii. Train staff on participation in Individual Education Plans (IEPs).

iii. Continue partnership with Families and Community Together (FACT) to educate students and their families about transition.

iv. Expand partnership with the Oregon Department of Education (ODE) Transition Network Facilitators (TNFs), including expansion of joint training opportunities.

v. Work to support youth who are not in school through strategic partnerships with other lead workforce agencies.

vi. Develop and implement summer activities for high school-aged students and youth; these opportunities will include work opportunities and post-secondary education exploration activities.

vii. Develop and implement year-round post-secondary education opportunities for youth and students.

c. Expand and improve VR services to Oregonians who have been underserved and underrepresented in the VR program.

i. Establish quarterly review of caseloads to ensure equitable access and outcomes.

ii. Establish local plans for community outreach when underserved or underrepresented populations are identified.

iii. Partner with agencies that provide culturally specific service.

iv. Continue working with Tribal VR programs to ensure access to joint case management and culturally appropriate services.

d. Work with state and local partners to increase access to employment including supported employment services for individuals.

i. Continue to meet the expectations outlined in Executive Order 15-01 and the Lane v. Brown settlement that address the need for competitive and integrated employment, including supported employment, opportunities for the commonly underrepresented population with intellectual and developmental disabilities (I/DD) in the workforce.

ii. Plan for, and implement a process to identify, track, and inform clients currently working in subminimum wage environments about opportunities to work in competitive and integrated employment.

e. Increase programmatic consistencies to ensure quality employment outcomes.

i. Align rules, policies, and procedure with the new WIOA requirements and statewide workforce development system.

ii. Create and implement a new service quality review process.

iii. Use data from the review process to inform training needs.

f. Increase the knowledge about and usage of assistive technology (AT).

i. Expand training for staff on availability of AT and its uses.

ii. Work with Access Technologies Inc. (ATI) to establish a communication plan to keep staff up to date on new technologies.

iii. Explore how to support FACT's training on AT to transition aged students and their families. Encourage VR staff attending IEP's to explore the use of AT at an earlier age for students.

2. Increase capacity and resources to provide enhanced levels of service to Oregonians with Disabilities

WTDB Imperative #2 calls for an "increase in the understanding and utilization of the system". VR is committed to increasing user and stakeholder awareness of the services available through the system and is in alignment with this imperative.

WTDB Imperative #4 calls for an alignment of the resources in the system to achieve the outcomes for all clients who utilize the workforce system. VR addresses the needs of underserved populations of Oregonians with disabilities and is consistently looking for opportunities to align, or braid funding and other resources for the benefit of the consumer.

a. Assist the workforce system with increasing its capacity and capability to serve Oregonians with disabilities.

i. Convene a cross agency workgroup to address the needs of underserved populations in the workforce system.

ii. Provide training to workforce partners on working with individuals with disabilities.

iii. Work with other agencies who work with clients with barriers to employment to address common access issues in the workforce system. Work with local workforce boards to ensure that programmatic access issues are identified and addressed.

b. Restructure the VR service delivery model to comply with state contracting requirements and be outcome driven.

i. Continue transition to newly structured pay-for-performance Job Placement Services Contract which includes a third track for individuals with the most significantly disabilities. These individuals require additional services that are were not funded appropriately in our traditional supported employment track.

ii. Create contracts with clear minimum qualifications, scope of work, and cost structure for all personal services to ensure high quality and consistent services statewide.

c. Expand the availability of vendor and partner services that meet the needs of Oregonians with disabilities, including those requiring supported employment services.

i. Develop a community college-based Career Pathway to develop job placement professionals and job coaches in the community.

ii. Identify areas of limited service availability, including supported employment services, and develop and implement recruitment and solicitation plans.

iii. Work with providers of sheltered and subminimum wage employment to transition to the integration of their clients into competitive and integrated employment in their respective communities.

3. Improve the performance of the VR program with respect to the performance accountability measures under section 116 of WIOA

VR has restructured its Training Unit and curriculum to teach the WIOA Common Performance Measures, the mechanisms to identify, track and record and to understand the implication of these measures on the outcomes for Oregonians with disabilities and their employment success. These measures are also the underpinnings for the Program's Department of Human Services (DHS) required Performance Management System and process are either in place or are being developed to regularly review the Common Performance Measures and to adjust the trajectory of the Program's activities as trends are identified.

a. Increase staff knowledge of the labor market.

i. Encourage branch level engagement with regional economists and workforce analysts to educate staff on local labor market issues.

ii. Work with Local Workforce Development Boards (LWDBs) to engage with local sector strategies and pursue high wage, high demand work opportunities.

b. Expand opportunities for skill gain and credentialing.

i. Identify and access local skill upgrading opportunities within the Local Workforce Areas (LWA).

ii. Partner with community college Disability Service Offices (DSOs) to increase access to existing credentialing programs.

iii. Work with employers to establish on-the-job training opportunities.

iv. Provide opportunities for skill upgrading for individuals who face barriers to work and career advancement based on disability.

c. Expand opportunities for clients to learn about and enter higher wage, high demand jobs.

i. Use labor market information to create work-based learning opportunities at local business who have high wage, high demand jobs.

ii. Inform clients about training opportunities to prepare them for jobs that are above entry level.

iii. Encourage clients to access VR services who face disability related barriers to advancement.

d. Create an employer engagement model that creates opportunities for work-based learning opportunities.

i. Identify and develop best practices for providing Business Relation Services.

ii. Create and train local VR employer engagement teams.

iii. Work with partners on joint engagement opportunities.

iv. Continue our collaboration with OFCCP (Office of Federal Contract and Compliance Programs) to support businesses in meeting their goals established by 503 Hiring Targets.

v. Utilize the SRC Business Committee to enhance engagement with employers.

e. Expand the use of benefits planning to assist Oregonians with disabilities.

i. Create online benefits training and information to address basic benefit concerns.

ii. Work with partner agencies to create additional funding opportunities for expanding capacity.

iii. Continue to partner with the Work Incentives Planning and Assistance program operated by Disability Rights Oregon.

### 3. Ensure that the goals and priorities are based on an analysis of the following areas:

### A. The most recent comprehensive statewide assessment, including any updates;

The most recent comprehensive needs assessment was completed in 2017 by VR and the Policy Institute. Recommendations and observations from this report are part of the planning process for this current State Plan.

As we are also in the process of contracting for and implementing our next CSNA, (due for completion September 2020) preliminary information has come available even though the assessment is not complete. That information is being analyzed regarding the impact it has on this current iteration of the VR Portion of the Oregon Combined State Plan.

### B. The State's performance under the performance accountability measures of section 116 of WIOA; and

Priorities, goals and strategies were crafted with an eye towards the needs of the Agency and the performance measures as defined by Section 116 of WIOA as well as a review of prior years' data regarding the metrics identified by Sec 116.

## C. Other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

As stated in the earlier attachment, VR's last CSNA was part of the discussion of what the goals, priorities, and strategies should accomplish. Additionally, VR considered the feedback received from multiple SRC surveys, including surveys with providers and staff. VR also considered DHS internal

audit recommendations. As VR looks to the future, the program understands that with tightening budgets and increased demands we must expand our services in a way that is both equitable and innovative in order to be successful. That understanding was very important to establishing this State Plan.

The Program as a regular practice reviews and discusses the Monitoring Guidance (currently 2019) provided by RSA. The Program considers the subjects identified in the Guidance and if necessary, adapts the program as necessary. In this fashion, the Program is preparing for any future Monitoring visit from the RSA. When this occurs, the Program will address any observations or recommendations that may be made. By having this regular review of Monitoring Guidance, we can continually look at relevant issues to improve the delivery of employment services to Oregonians with Disabilities.

### m. Order of Selection

Describe:

### 1. Whether the designated State unit will implement and order of selection. If so, describe:

### A. The order to be followed in selecting eligible individuals to be provided VR services

The Oregon Vocational Rehabilitation (VR) Program has provided services to all eligible Oregonians since July 2010. Projections do not indicate that VR will need to invoke an Order of Selection at this time or in the next biennium.

If circumstances change, and VR must consider invoking an Order of Selection, the program has a process with which to address the issues of returning to an Order of Selection status, including discussions with the State Rehabilitation Council (SRC) regarding process, the determination of Priority Groups and timeframes.

#### B. The justification for the order

Oregon VR is not in an Order of Selection at this time.

#### C. The service and outcome goals

Oregon VR is not in an Order of Selection at this time.

D. Time within which these goals may be achieved for individuals in each priority category within the order; and

Oregon VR is not in an Order of Selection at this time.

E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities

Oregon VR is not in an Order of Selection at this time.

2. If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment

### n. Goals and Plans for Distribution of title VI Funds

#### 1. Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services

Oregon Vocational Rehabilitation's (VR's) goal for all funds used for supported employment services is to help individuals whose disabilities and functional limitations have traditionally meant that they would not be able to successfully enter the labor market and be successful in employment. VR does not prioritize one disability group over another. VR works to leverage these funds with other partners and providers who have a vested interest in the success of the populations we serve. VR strives to expand our supported employment efforts and increase our outcomes.

The funds are used to provide supported employment services to those adult and transitional age youth with the most significant disabilities. At least 50% of these funds are targeted towards youth with the most significant disabilities who need them to transition to employment.

Supported employment services, occurring after placement, include job development, job coaching, and any extended supports needed. For individuals with a primary disability of intellectual and/or development disability (I/DD), clients will receive extended services after closure from the Office of Developmental Disabilities Services (ODDS). For clients with mental health disabilities who receive services from Oregon Health Authority (OHA) Mental Health programs, extended services are provided by the fidelity based Individualized Placement and Support Services (IPS) program once the client exits from VR.

## 2. Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:

### A. The provision of extended services for a period not to exceed 4 years; and

For youth with significant disabilities, VR may provide up to 4 years of extended support services, in specific instances and based on individual need. This service must be provided on a year-by-year basis to better assess the individual needs of the Participating Youth and ensure informed choice.

## B. How the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

Services are coordinated from the outset of involvement to ensure that the clients receive appropriately sequenced services in order to achieve the best possible employment outcomes. VR's Title VI, Supported Employment Funds are \$300,000 for FFY 2019. At a current cost per case of approximately \$3,155, VR will be able provide services to approximately 104 clients using these funds. The number of individuals receiving supported employment services is much larger than this number and is supported using Title I funds.

### o. State's Strategies

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR

and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

### 1. The methods to be used to expand and improve services to individuals with disabilities

Oregon Vocational Rehabilitation (VR) and the State Rehabilitation Council (SRC) created a series of goals, priorities, and strategies that are found earlier in this plan. The strategies identified below come from that portion of the plan and address the specific questions of this attachment. They do not represent all the strategies that the program has identified as ways to achieve our goals and priorities.

The methods to be used to expand and improve services to individuals with disabilities:

(1) Promote earlier engagement with workforce partners for VR clients;

(2) Streamline the referral process to and from workforce and other partners, while continuing to improve data collection from common referral agencies;

(3) Work with VR staff to streamline the development and completion of Individual Plans for Employment (IPEs) in order to get clients into plan more quickly;

(4) Continue the implementation of training regarding the expectations and goals identified in the Workforce Innovation and Opportunity Act (WIOA) for new and developing VR staff in order that the significance of the Common Performance Measures is understood in the context of successful client outcome.

## 2. How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis

(1) Provide training for management staff on the availability and the process to obtain assistive technology (AT);

2) Work with Access Technologies Inc. (ATI) to establish a communication plan to keep staff up to date on new technologies;

(3) Work with workforce partners in order to assist them in recognizing when interventions regarding the provision of AT are appropriate; and assist them as necessary to do so;

(4) Encourage VR staff attending Individualized Education Plan (IEP) meetings to evaluate the use of AT with students.

3. The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program

The Department of Human Services (DHS) has established the Office of Equity and Multicultural Services (OEMS). There is now a representative from OEMS embedded in each of the 5 DHS Programs. The VR program looks forward to working with OEMS and our OEMS representative to assess and identify any areas that need improvement in this regard and implement activities to see that Oregonians with the most significant disabilities who are minorities or have been underserved have an equitable opportunity to receive the VR services they need to become successful in the workplace.

(1) Complete regular review of caseload data to ensure that there is equitable access to VR services and to ensure comparable representation based on demographics of the community.

(2) In partnership with OEMS, establish local plans for community outreach when underserved or underrepresented populations are identified within the community.

(3) Partner with agencies that provide culturally specific employment services to increase opportunities to access service and increase employment outcomes.

(4) Continue working with Tribal VR 121 programs to ensure successful joint case management and culturally appropriate services to Tribal members.

(5) Develop relationships with workforce partners to promote awareness of cultural and disability needs in the service delivery model.

4. The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and preemployment transition services)

(1) Develop a meaningful presence in all high school districts in Oregon.

(2) Train staff on participation in IEPs.

(3) Expand partnership with the Oregon Department of Education (ODE) Transition Network Facilitators (TNFs), including expansion of joint training opportunities.

(4) Work to support youth who are not in school through strategic partnerships with other lead workforce agencies.

(5) Develop and implement summer activities for high school–aged students and youth; these opportunities will include work opportunities and post–secondary education exploration activities.

(6) Develop and implement year-round post-secondary education opportunities for youth and students.

### 5. If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State

VR partners with and purchases many rehabilitation services from community programs. VR has been working with Community Rehabilitation programs (CRPs) who are transitioning from a sheltered and subminimum wage model to a more inclusive focus on competitive, integrated employment opportunities. This assistance and guidance allow us to ensure that there is capacity within the system to provide needed services to VR clients and to meet the various mandates of the state and WIOA regulations regarding competitive, integrated employment (CIE) outcomes for all VR clients.

Additionally, VR continues to identify areas of the state that have insufficient capacity and continues the work to rectify this lack of capacity

## 6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA

1. Increase staff knowledge of the labor market.

a. Encourage branch level engagement with regional economists and workforce analysts to educate staff on local labor market issues.

b. Work with Local Workforce Development Boards (LWDBs) to engage with local sector strategies and pursue high wage, high demand work opportunities.

2. Expand opportunities for skill gain and credentialing.

a. Identify and access local skill upgrading opportunities within the Local Workforce Areas (LWAs).

b. Partner with community college Disability Service Offices (DSOs) to increase access to existing credentialing programs.

c. Work with employers to establish on-the-job training opportunities.

d. Provide opportunities for skill upgrading for individuals who face barriers to work and career advancement based on disability.

3. Expand opportunities for clients to learn about and enter higher wage, high demand jobs.

a. Use labor market information to create work-based learning opportunities at local businesses who have high wage, high demand jobs.

b. Inform clients about training opportunities to prepare them for jobs that are above entry level.

c. Encourage clients to access VR services who face disability related barriers to advancement.

4. Create an expansive employer engagement model that creates opportunities for work–based learning opportunities.

a. Develop a common employer engagement plan, language, and focus that can be used statewide.

b. Implement a progressive employment model.

c. Create and train local VR employer engagement teams.

d. Work with partners on joint engagement opportunities.

e. Engage with employers on the need to meet the 503 federal hiring targets.

f. Utilize the SRC Business Committee to enhance engagement with employers.

5. Expand the use of benefits planning to assist Oregonians with disabilities

a. Create online benefits training and information to address basic benefit concerns.

b. Work with partner agencies to create additional funding opportunities for expanding capacity.

c. Continue to partner with the Work Incentives Planning and Assistance program operated by Disability Rights Oregon.

VR has been and continues to be an active participant in the implementation of the WIOA. The VR Administration has taken an active leadership role in the process of developing the protocols and policies that will govern the inter-Title, inter-program and inter-agency negotiations, collaboration and implementation of agreements that will govern the delivery of workforce activities for years to come. The Deputy Director of VR sits on the Workforce Systems Executive Team (one of 5) in order to facilitate the development and direction of work teams consisting of various agency participants in order to clarify, define and affect delivery of coordinated workforce services. These services are being defined as more than just a "referral" process but an understanding that all partners are working together to deliver the most efficient and nonduplicative services a consumer requires. This is especially important in the area of service delivery to Oregonians with disabilities. VR is leading the way in working with partners to know what to do, when to do it and when to come to VR for more

specific interventions for Oregonians with disabilities who are accessing employment services through the developing unified workforce delivery system that is evolving in Oregon.

The message that the workforce system must align and integrate is being delivered to the nine LWDBs with VR representation on every local board as well as VR representation on the Oregon Workforce Investment Board (OWIB). VR's goal is to see that the development of local service delivery systems reflect the intent of WIOA, that Oregonians with disabilities can access workforce services either when the impediment mitigation has occurred or with the understanding that cases requiring VR assistance to overcome disability based impediments that are a true barrier to work will be provided with services utilizing the expertise for the programs in partnership as is necessary to achieve the consumer's goal (arrived at through an informed choice and career exploration/labor market research goal identification process).

# 7. Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities

Since the passage and implementation of WIOA, VR has been an active participant in the evolution of Oregon's workforce system. Strategies regarding the development of the workforce system overall but more specifically for the benefit of Oregonians with the most significant disabilities are:

1. Convene a cross agency workgroup to address the needs of underserved populations in the Workforce system.

2. Provide training to workforce partners on working with individuals with disabilities.

3. Collaborate and coordinate with other agencies who work with Oregonians with barriers to employment to address common access issues to the workforce system.

4. Participate with local workforce boards to ensure that programmatic access issues are identified and addressed.

### 8. How the agency's strategies will be used to:

### A. Achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

The goals and priorities of the VR program are informed by the Comprehensive Statewide Needs Assessment (CSNA). While this iteration of the VR portion of the State Plan is still based on information from the 2017 CSNA, we are in the process of completing our next CSNA. New information and any changes that will be required based on the outcome of the next CSNA (to be completed September 2020) will be identified and addressed in the 2022 update of the VR portion of the State Plan.

#### B. Support innovation and expansion activities; and

The second of three primary goals of VR is the continued development of capacity to meet field and client needs. The Program plans to review and analyze the possibility of utilizing CFR 361.5 (b)(16). As activities are identified regarding the utilization of the Programs Innovation and Opportunity funds, they will be reported in the 2022 updates.

C. Overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.

As the identified Strategies are implemented, we should see access and participation issues decrease as overall program improvements are implemented.

## p. Evaluation and Reports of Progress: VR and Supported Employment Goals

Describe:

1. An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:

#### A. Identify the strategies that contributed to the achievement of the goals

The Oregon Vocational Rehabilitation (VR) goals that were established in the 2016-2019 Unified State Plan were as follows:

a.) Increase quality employment outcomes for all Oregonians with disabilities.

In 2017, VR served 16,661 clients with 5,297 entering plan resulting in 2,958 (62.3%) exiting successfully.

In 2018, VR served 17,204 clients with 5,131 entering Plan resulting in 2,745 (60.2%) exiting successfully.

In 2019, VR served 16,907 clients with 5,188 entering plan resulting in 2,925 (57%) exiting successfully.

While there was a slight decrease in the number of clients, more clients entered plan and there were more successful exits although the percentage shows a slight decrease.

b.) Increase capacity and resources to provide enhanced levels of service to Oregonians with

disabilities.

VR has increased the number of Job Placement Contractors from 164 to 215 from PY 2015 to PY 2018. VR has (indicated elsewhere) increased its participation with the school system in Oregon regarding transition programs for youth and has also created a Pre-Employment Transition Services (Pre ETS) delivery system.

c.) Improve the performance of the VR program with respect to the performance accountability measures under section 116 of WIOA.

The following is the representation of VR's performance in these areas by PY:

2 <sup>nd</sup> quarter retention:	2016: 57.5%	2017: 58.7%	2018: 59.8%
4 <sup>th</sup> quarter retention:	2016: 55.1%	2017: 55.4%	2018: 56.3%
Measurable skills gain:	2016: 22%	2017: 29%	2018: 23%
Credential attainment:	2016: 22%	2017: 32%	2018: 36%
Weekly wages:	2016: \$320.92	2017: \$325.97	2018: \$355.21

Statistical modelling assists us in projecting the following <u>trends</u> in these categories for PY 2019 and PY 2020: At this point, these are trends, not targets. The only expected Target required is for MSG, please see narrative below.

2 <sup>nd</sup> quarter retention:	2019: 63.0%	2020:	65.9%
4 <sup>th</sup> quarter retention:	2019: 59.3%	2020:	62.1%
Measurable skills gain:	2019: 24%	2020:	30%
Credential attainment:	2019: 39%	2020:	43%

<u>Measurable Skills Gain:</u> Guidance for the Combined State Plan asks for expected levels of MSG for PY 2020 and PY 2021. It also asks for negotiated levels for the same time periods, but negotiations have not yet taken place. The Oregon General VR Program received data from RSA that indicates PY 2017 a 26.4% MSG rate and for PY 2018 that number is 23%. The first quarter for PY2019 shows a rate of 6.3%. The OR-T percentage is 24.6% and the National-T is 25.5%

We anticipate an expected rate of 25.5% for PY 2020 and an expected rate of 26.5% for PY 2021.The increase will be a result of enhanced staff training in the capturing of data related to MSG, an increased emphasis on the concept of skills enhancement utilizing methodology that results in MSG being attributed to a client and the results of Pre-Ets services being identified and results being seen as these Students enter the VR Process ( when appropriate) and they engage in activities that result in an MSG. An evaluation of this Strategy will be completed for the 2022 State Plan update.

### B. Describe the factors that impeded the achievement of the goals and priorities

Oregon is a diverse state with one large metro area and many rural jurisdictions. The primary reason VR is challenged in some goals is the lack of capacity in the rural areas where VR services are being provided. Prior goals and expectations have been met but moving forward with the implementation of state and federal legislative requirements and expectations will be challenging in some ways to meet those expectations. In section VI-VR-o.5, plans are explained to increase capacity and to work with an evolving provider system to meet current expectations. Prior goals were around meeting RSA requirements and for the most part, VR has been successful in this area. New goals take into account VR Leadership changes, implementation of new state and federal legislation and requirements, and new expectations from VR's umbrella organization, the Department of Human Services (DHS). Impediments to achieving these new goals will clearly be in the ability to develop the capacity and the relationships in various parts of the state to meet these goals. Additional challenges are staff turnover, lack of staff at an administrative level and the changing caseload demographics. This will require new and additional policy development. The program will then need to bring this new information and procedures to the field.

2. An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:

A. Identify the strategies that contributed to the achievement of the goals

VR was able to use previously established partnerships with our Supported Employment partners to achieve the Programs Supported Employment goals.

Strategies included:

- Person—centered planning
- · Community-based assessment
- · Job development and job placement
- On-site training for worker and/or co-workers
- Long-term support development
- Other services and goods
- Post-employment service

In addition to these strategies being utilized, the environment in Oregon that has resulted from the Governors Executive Order, the Lane V Brown Settlement Agreement and the WIOA expectations established regarding Competitive, Integrated Employment has resulted in a significant increase in the number of Supported Employment clients receiving SE services and entering the workforce:

PY 2016 Clients in Supported Employment	537
PY 2017 Clients in Supported Employment	595
PY2018 Clients in Supported Employment	634
PY 2019 (projected) Clients in Supported Employment	685
PY 2020 (projected) Clients in Supported Employment	734

During the same periods of time, the Supported Employment Clients entering CIE is:

PY 2016 295 PY 2017 261 PY 2018 191

This includes all clients with descriptors in the case management system that indicate Supported Employment services and includes Developmental Disability, Intellectual Disability, Mental Health and Traumatic Brain Injury.

### B. Describe the factors that impeded the achievement of the goals and priorities

Factors which impede even better outcomes for the Program's supported employment clients are readily identified in (p)(1)(B). The issues are resolving as strategies continue to be implemented and mature. The relationships at the state's Administrative level between the Office of Developmental Disabilities (ODDS) and the Oregon Health Authority (OHA) Behavioral Health have continued to improve and mature. This is reflected in the local areas as branch offices and individual counselors create and maintain effective working relations with their counterparts in the other agencies addressing supported employment. There are still issues regarding skill level and turnover which has a deleterious effect but those situations as they occur are being dealt with more effectively. Oregon

has begun to see a melding of the General VR Program, and the I/DD and mental health systems resulting in better, quality outcomes for these clients.

## 3. The VR program's performance on the performance accountability indicators under section 116 of WIOA

Please see: (p)(1)(A)

## 4. How the funds reserved for innovation and expansion (I&E) activities were utilized

VR utilizes a portion of our funds every year to provide innovative activities that allows us to expand our services. In the past year we have focused our innovation on funding Training Network Facilitator positions to help us expand our relationships with Special Education programs across the state. VR continues to use these funds to expand our work with Easter Seal's Latino Connection to ensure that we continue to provide equitable services to the Latino Population.

The Program plans to review and analyze the possibility of utilizing establishment grants to expand the capacity of CRPs. As this develops, we anticipate further explanation in the 2022 updates.

## q. Quality, Scope, and Extent of Supported Employment Services

Include the following:

### 1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities

VR's Supported Employment Program provides opportunities for individuals of ages with the most significant disabilities to achieve competitive integrated employment with ongoing support provided by a variety of partners. These same individuals are those for whom competitive employment has not traditionally occurred. VR provides a continuum of supported employment services in partnership with other human services agencies and programs that persons with the most significant disabilities need to develop, maintain and advance in competitive employment. VR continues to work closely with other state programs, local governmental units, community–based organizations and groups to develop, refine and expand the availability of supported employment services throughout Oregon.

VR currently has over 192 contracts in place to provide job placement statewide. These contracts give VR the ability to pay for placement services in three tiers based on the significance of the functional limitations that the client experiences. Tiers 2 and 3 focus on clients who require supported employment services in order to be successful in the labor market; with Tier 3 designed for those with the most extreme barriers to employment and/or a need for customized employment. Oregon initiated a pilot project in fall 2019 designed to increase the number of VR participants who appropriately receive Tier 3 services and increase the number of job developers who choose to serve this population of job seekers. To facilitate the pilot, the VR job developer's required training was revised, and a version was created and launched for VR staff who manage the job development contracts. Simultaneously, staff training and technical assistance to raise staff skill and knowledge in working with those with the most significant functional limitations is being coordinated by VR with assistance from Youth Technical Assistance Center staff.

Historically, VR has partnered with the OHA Behavioral Health Programs in promoting Individualized Placement and Support (IPS), an evidence–based supported employment model. The quality of these programs is assessed through compliance with a scale, which measures the 'fidelity' or the degree to

which a program is being implemented in accordance the evidence-based fidelity model developed after extensive research from Dartmouth College. Some of the measures used in the IPS fidelity scales are the kinds of employment outcomes participants are obtaining; the degree of collaboration with VR; availability of rapid job search and evidence of consumer choice. VR maintains quality supported employment outcomes through ongoing collaboration with mental health providers on the local level and OHA Mental Health Programs central office staff.

Supported employment is integrated into the array of services and programs available to Oregonians with disabilities, including Oregon's mental health and developmental disability service systems.

Success in supported employment requires a partnership among the responsible state and community programs, other service providers, consumers and families, advocacy organizations, employers and others. Long–term success continues to depend on the availability of funding for follow–along supported employment services.

- Work is performed in an integrated setting.
- The individual is receiving a wage and benefits commensurate with non-disabled workers doing the same work.
- The individual is receiving opportunities for advancement commensurate with non-disabled workers doing the same work.
- The ongoing support needs and sources of support have been identified and secured.
- Supported employment services provided to clients are for the maximum number of hours possible, based on the unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice of individuals with the most significant disabilities.
- Clients and employers are satisfied with placements.

VR utilizes Title VI, Part B and Title I funds for the time–limited services necessary for an individual to stabilize in a community-based job. Services that may be part of a supported employment IPE include:

- Person centered planning
- Community-based assessment
- Job development
- Job placement
- On-site training for worker and/or coworkers
- Long-term support development
- Other services and goods
- Post-employment services

The specific type, level and location of ongoing supports provided to an individual are based upon his or her needs and those of the employer. Ongoing support may be provided by a variety of public and/or private sector resources including:

- OHA Behavioral Health Programs and community mental health programs
- ODDS community supports
- County developmental disability case managers and developmental disability service brokerages
- Social Security work incentives
- Employer-provided reasonable accommodations
- Natural supports
- Family or community sponsorship

### 2. The timing of transition to extended services

Generally, VR will not exceed its 24–month in–plan status with a supported employment case. This 24–month timeline can be extended for exceptional circumstances, if the counselor and client jointly agree to the extension. Job coaching and/or on–the–job training supports are usually structured into a much shorter time frame, with long–term extended services being built into the plan as quickly as possible to ensure ongoing success when VR involvement ends.

For youth with significant disabilities, VR may provide up to four years of extended support services, in specific instances and based on individual need. This service must be provided on a year-by-year basis to better assess the individual needs of the participating youth and ensure informed choice.

### Vocational Rehabilitation (Combined or General) Certifications

States must provide written and signed certifications that:

1. The (enter the name of designated State agency or designated State unit, as appropriate,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA[14], and its supplement under title VI of the Rehabilitation Act[15];

Enter the name of designated State agency or designated State unit, as appropriate

Vocational Rehabilitation Program, Oregon Department of Human Services (VR/DHS)

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency)[16] agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan[17], the Rehabilitation Act, and all applicable regulations[18], policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan[17] of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;

Enter the name of designated State agency

Vocational Rehabilitation Program, Oregon Department of Human Services (VR/DHS)

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan[19], the Rehabilitation Act, and all applicable regulations[20], policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Secretary of Education.

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement;

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.

7. The (enter the name of authorized representative below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;

Enter the name of authorized representative below

Keith Ozols

8. The (enter the title of authorized representative below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;

Enter the title of authorized representative below

Director

9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

### Footnotes

[14] Public Law 113-128.

[15] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

[16] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[17] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[18] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR

part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations.

[19] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[20] Applicable regulations, in part, include the citations in footnote 6.

### **Certification Signature**

Signatory information	Enter Signatory information in this column
Name of Signatory	Keith Ozols
Title of Signatory	Director, VR Program, Oregon Department of Human Services
Date Signed	[February 28, 2020 ]

### Assurances

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: **The State Plan must provide assurances that:** 

The State Plan must include	Include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:Administration of the VR services portion of the Unified or Combined State Plan:	
3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act	
3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):	
3.b.(A) "is an independent State commission" (Yes/No)	No
3.b.(B) "has established a State Rehabilitation Council" (Yes/No)	Yes
3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act	
3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3)	
3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as	No

The State Plan must include	Include
appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	
3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	No
3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan	Yes
3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act	
3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act	
3.j. The requirements for the comprehensive system of personnel development, as set forth in section $101(a)(7)$ of the Rehabilitation Act	
3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act	
3.I. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities	
3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act	
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:	
4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	
4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act	
4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)	Yes
4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act	
4.e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	

The State Plan must include	Include
4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act	
4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14)of the Rehabilitation Act	
4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs	
4.j. With respect to students with disabilities, the State,	
4.j.i. Has developed and will implement,	
4.j.i.I. Strategies to address the needs identified in the assessments; and	
4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and	
4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))	
5. Program Administration for the Supported Employment Title VI Supplement:	
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act	
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title Act Separately for supported employment services under title I and individuals receiving supported employment services under title I and individuals receiving supported employment services under title I and individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act	
5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act	1
6. Financial Administration of the Supported Employment Program:	
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act	
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when	;

The State Plan must include	Include
providing supported employment services specified in the individualized plan for employment,	
in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act	
7. Provision of Supported Employment Services:	Yes
7.a. The Designated State Agency Assures That it Will Provide Supported Employment	
Services as Defined in Section 7(39) of the Rehabilitation Act	
7.b. The designated State agency assures that:	
7.b.i. The comprehensive assessment of individuals with significant disabilities conducted	
under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation	
Act includes consideration of supported employment as an appropriate employment outcome,	
in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act	
7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of	
the Rehabilitation Act, which is developed and updated with title I funds, in accordance with	
sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act	

## Vocational Rehabilitation Program (Combined or General) Performance Indicators

#### Performance Goals for the Core Programs

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

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

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

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

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

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

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

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

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

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

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

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

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

Performance Indicators	PY 2020	PY 2020	PY 2021	PY 2021
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter After Exit)	Baseline	Baseline	Baseline	Baseline

PY 2020	PY 2020	PY 2021	PY 2021
Expected Level	Negotiated Level	Expected Level	Negotiated Level
Baseline	Baseline	Baseline	Baseline
Baseline	Baseline	Baseline	Baseline
25.5%		26.5%	
Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>
	Expected Level Baseline Baseline 25.5%	Expected LevelNegotiated LevelBaselineBaselineBaselineBaseline25.5%Image: Constraint of the second	Expected LevelNegotiated LevelExpected LevelBaselineBaselineBaselineBaselineBaselineBaseline25.5%26.5%

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

## Program-Specific Requirements for Vocational Rehabilitation (Blind)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan [13] must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA:

[13] Sec. 102(b)(2)(D)(iii) of WIOA

### a. Input of State Rehabilitation Council

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. Input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;

1. N/A. The Oregon Commission for the Blind (OCB) is an independent consumer controlled commission with a Governor appointed State Board that provides governance and program guidance, and as such is not required to submit this section. The results of the 2017 Certified State Wide Needs Assessment (CSNA), and detailed preliminary feedback from the 2020 CSNA were used to inform plan elements. OCB's program specific portion of the Oregon Combined State Plan draft submission has been reviewed and approved by the OCB Board of Commissioners. Further, the OCB program specific portion of the state of Oregon has been informed and aligned with the Oregon Workforce Talent Development Board's Strategic Imperatives and Objectives as well as OCB's own Strategic Priorities.

2. The designated State unit's response to the Council's input and recommendations; and

N/A. The Oregon Commission for the Blind procured, participated in, and oversaw the development of the 2017 CSNA, the initiation of the 2020 CSNA, and the development of OCB's portion of Oregon's WIOA 2020 Combined State Plan. OCB's Board of Commissioners provided feedback on the development of agency goals and strategic priorities, and voted to approve a draft of this plan.

## 3. The designated State unit's explanations for rejecting any of the Council's input or recommendations.

N/A

### b. Request for Waiver of Statewideness

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

# 1. A local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;

The Oregon Commission for the Blind does request a waiver of state wideness for our transition program that serves transition aged youth who are blind or who have conditions likely to lead to legal blindness that are in high school and beginning the planning process of exiting school and entering into pre-employment Transition Services. Our transition services are provided statewide through transition counselors employed by the agency, and we also have agreements in regions around the state that enhance the services available in those areas.

Each third party cooperative agreement is negotiated to include specifically what pre-employment transition services will be provided with the nonfederal share. These agreements are negotiated and approved in advance of the services being provided. Services include the following: provide OCB staff with input and feedback on transition programs and students' Individualized Education Plans as they relate to preparing for and entering into employment, make appropriate referrals of students to OCB at the beginning of the transition planning process from school to employment, assist in the coordination of job development for Summer and/or after school work experiences or internships, identify Regional Program Orientation and Mobility personnel to provide orientation and travel training to job sites for students during the school year, coordinate Individual Education Plan/Individual Transition Plan meetings with OCB, assist in Career Exploration and Assessment, provide information to students and parents/significant others on blindness, assist OCB Technology Specialists in assessing students on technology skills related to future employment.

## 2. The designated State unit will approve each proposed service before it is put into effect; and

Currently OCB has agreements with Portland Public Schools, the Northwest Regional Education Service District, and Greater Albany Public Schools. These agreements are used to receive nonfederal funds from the school district/regional education programs that are used by the agency as match for federal funds. These agreements stipulate that the entity will provide specific preemployment Transition Services outlined in the agreement to eligible students.

In addition, The Commission will approve each proposed service before it is put into effect through the negotiation and execution of the third party cooperative agreement.

### 3. Requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

Requirements of the VR services portion of the Unified State Plan will apply to the services approved under the waiver. Each of the interagency/intergovernmental agreements includes assurances that all State Plan requirements apply, including Order of Selection.

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

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

### 1. Federal, State, and local agencies and programs;

The Oregon Commission for the Blind (OCB) is committed to collaborating with stakeholders as an essential aspect of assisting people with disabilities to successfully become employed. This ongoing effort maximizes resources and addresses the quality of life issues that can enhance the ability of a person with a disability to obtain and maintain employment.

The agency recognizes that the major leading causes of blindness are diabetes and age related macular degeneration. For this reason, the agency maintains regular communication with the medical community as well as WIOA and non-WIOA partners who provide services to Oregonians throughout the state. Staff regularly engages with these organizations in order to outreach to potential referral sources and clients and to provide education on blindness related issues.

These relationships are long standing and most have not culminated in formal cooperative agreements. However, the Commission for the Blind is open to such agreements as the state workforce system continues in the implementation of WIOA.

OCB actively partners with Centers for Independent Living (CIL) around the state. OCB refers clients for related services to support their independent living goals and individualized plans for employment. We also often receive referrals from these CILS and work in collaboration with CILs to improve outcomes for our mutual clients. OCB actively engages with and partners with the Washington State School for the Blind (WSSB), school districts/regional programs, teachers of the visually impaired, and families of students with vision loss in order to insure the youth are supported throughout their transition from high school to college/employment. OCB collaborates with the Oregon University System (OUS). OCB and Oregon's Office of Vocational Rehabilitation Services (OVRS) have entered into a formal agreement with the Oregon University System and public institutions of higher education in Oregon. This agreement facilitates collaboration for our participants with disabilities who are attending Higher Education schools in the state of Oregon. OCB has developed MOUs or Cooperative Agreements with the state community colleges individually. The community college agreements include: Tillamook Bay Community College, Klamath Community College, Blue Mountain Community College, Clackamas Community College, Portland Community College, Chemeketa Community College, Southwestern Oregon Community College, Oregon Coast Community College, Clatsop Community College, Rogue Community College, Treasure Valley Community College, Clackamas Community College, Lane Community College, Mt Hood Community College and Linn-Benton Community College. OCB has agreements with the following four year colleges: Willamette University and Portland State University. OCB has agreements in place with the Oregon School for the Deaf to better provide coordinated services for students who are deaf/blind.

OCB engages with tribal vocational rehabilitation programs in order to better serve our mutual clients. OCB has cooperative agreements in place with the following Tribal entities: The Confederated Tribes of the Siletz, The Confederated Tribes of the Umatilla Indian Reservation Tribes, The Confederated Tribes of Warm Springs.

## 2. State programs carried out under section 4 of the Assistive Technology Act of 1998;

OCB engages with the Public Utility Commission Technology Devices Access Program. The Oregon Telecommunication Devices Access Program (TDAP) loans adaptive telephone equipment at no charge and with no income restrictions to eligible Oregon residents who have a loss in hearing, speech, vision, mobility or cognition. The Public Utility Commission of Oregon oversees the program.

The Oregon Commission for the Blind has a current agreement with Access Technologies, Incorporated, the current Technology Act provider in Oregon, to provide the following skills training that prepare an individual for a work setting: Basic and Intermediate Screen Reading using JAWS, WindowEyes, Zoom Text Reader, Guide. Magnification software training including Zoom Text, MAGic, Windows Built In Accessibility system, Basic Keyboarding, Basic Windows, Navigation of keyboard commands and document, word processing, email, internet navigation, Excel development of worksheets and use of PowerPoint.

## 3. Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;

N/A

### 4. Non-educational agencies serving out-of-school youth; and

The Oregon Commission for the Blind (OCB) is actively engaged with the National Federation of the Blind of Oregon and the American Council of the Blind of Oregon. Both consumer groups have been very helpful in offering scholarships to clients as well as providing mentoring and educational opportunities to clients. Both organizations also hold positions on the agency's board and are very active in setting agency policies and priorities.

OCB engages with Northwest Association for Blind Athletes (NWABA) in order to provide clients with exposure to social and environmental experiences that prepare them for dealing with challenges and opportunities in both independent living and work.

The agency regularly and actively engages with businesses around the state through involvement with local Chambers of Commerce and other business facing organizations. Although these are not formally connected to the workforce system, these are important connections in order to maximize the placement opportunities for OCB clients.

### 5. State use contracting programs.

N/A

### d. Coordination with Education Officials

Describe:

1. The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt

### of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students

The Oregon Commission for the Blind has a long history of successful coordination with education officials at the state and local level, in order to enhance the service delivery for transition aged students in Oregon. OCB collaborates with a number of partners to coordinate strategic activities to insure positive outcomes for students with vision loss. There is active information sharing and coordinated planning between OCB and regional programs, OVR, education and health care organizations throughout the state. Partners join in planning outreach efforts, coordinate referral of potentially eligible youth for VR, and implement process improvements for assessment & training statewide in the areas of daily living skills, orientation and mobility/cane travel, communication skills, technology, vocational aptitudes, interpersonal /social skills, and academic preparation for transitionage youth.

Youth, starting at age 14 are able to access OCB's application for vocational rehabilitation services, as well as Pre-Employment Transition Services (Pre-ETS). Youth begin receiving Pre-ETS prior to receiving Vocational Rehabilitation Services. All potentially eligible youth may receive Pre-ETS regardless if they meet VR eligibility requirements. When youth turn 16 they also become eligible to apply for the Summer Work Experience Program (SWEP). To participate in SWEP, youth apply for VR and must be eligible for VR services in order to attend. All Youth who apply for VR Services, starting as early as 14 years, participate in the application, eligibility, and plan development process. Youth collaborate with their VRC to develop an Individualized Plan for Employment (IPE) within 90 days of eligibility, which matches the timeline for adult services.

In addition: The Oregon Commission for the Blind has a Cooperative Agreement with the Oregon Department of Education and Vocational Rehabilitation.

## 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;

OCB's primary services while a student is in high school are outreach, assessment, information & referral, counseling & guidance, and pre-employment transition services in order to prepare for successful transition into post-secondary higher education and career activities. Consultation and technical assistance is provided to both the SEA and LEAs around the state, using alternate means for participation when needed (i.e. video or conference calls), to assist the ODE in planning for the transition services, transition services for youth, and other vocational rehabilitation services.

Under the Cooperative Agreement with the Oregon Department of Education, the following responsibilities are outlined:

The Oregon Department of Education will assist local education agencies, including the Oregon School for the Deaf: in accessing the services provided by OCB, which can be requested to aid in the transition to employment services, serve as a liaison between the parties, encourage the screening, identifying and referring of potential clients to OCB to provide a continuum of appropriate procedures and services, identify methods to coordinate the IEP with the IPE, provide information related to the availability of public education programs, and facilitate the availability of diagnostic and evaluative information to the Oregon Commission for the Blind relevant to the determination of eligibility.

The Oregon Commission for the Blind will provide consultation & technical assistance, using alternate means for participation when necessary (i.e. video or conference calls) to the schools to prepare students with disabilities for career opportunities.

# B. Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

OCB authorizes and pays for any services needed to establish a transition student's eligibility for OCB services, and funds services outside the scope of the school district's IDEA and FAPE (Free Appropriate Public Education) responsibility. OCB collaborates with educational staff and families to ensure youth who are blind have early exposure to pre-employment transition services such as career exploration, job shadowing and paid work experiences, and extra-curricular opportunities to more fully develop self- advocacy and independent living skills. OCB transition counselors conduct outreach and ongoing consultation statewide to teachers of the visually impaired, students, families and others in the education community.

As outlined in the Cooperative Agreement for ODE, VR, and OCB, transition planning is addressed as:

VR and OCB will:

Participate as available per district in regular transition planning meetings and department meetings, when invited.

Attend meetings for the development of an Individualized Education Plan (IEP) when invited, with appropriate consent and as resources allow. VR and OCB will not charge the schools district for staff to attend these meetings.

Provide a transition and Pre-ETS materials to the SEA and LEA to distribute to students, family members, guardians or their representatives.

In collaboration with LEAs, provide or arrange for the provision of Pre-ETS to all students with disabilities identified as requiring these services.

Determine the eligibility of all students with disabilities who have applied for Vocational Rehabilitation services within 60 days from the date of application pursuant to section 102(a)(6) of the Rehabilitation Act and section 34 CFR 361.41(b)(1) of its implementing regulations.

Develop an Individualized Plan for Employment (IPE), which is consistent with and which takes into consideration the student-client's IEP transition planning goals, prior to exit and within 90 days of VR/OCB eligibility, unless an extension is approved.

ODE will:

Provide for transition planning by designated education agency personnel for students with disabilities that facilitates the development and implementation of their Individualized Education Programs (IEPs) under section 614(d) of IDEA.

Develop an IEP which is consistent with and which takes into consideration the student-client's IPE with VR and OCB.

# C. Roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

Starting as early as 14 years old, students who are blind, Deaf/blind, and visually impaired become eligible to apply for individualized vocational rehabilitation services and/or participate in Pre-ETS as a potentially eligible student. Case management activities are coordinated by the agency's VR Counselors to provide pre-employment transition services. OCB also coordinates closely with local school districts and regional Teachers of the Visually Impaired (TVIs), to identify students who are blind and visually impaired that are eligible for VR services.

As outlined in the Cooperative Agreement for ODE, VR, and OCB, responsibilities are addressed as:

Meet regularly to address systems, policy, practice and funding issues that facilitate or negatively impact the transition of youth with disabilities from school to work or post-secondary education.

Foster innovation in transition program design and service delivery strategies between VR, OCB and LEA.

Utilize a common message when sharing information to local VR and OCB offices and LEA's.

Post this agreement on their respective websites (or in a location readily available to agency staff).

Align policy and practice at the state and local level, in order to facilitate the seamless transition of youth with disabilities from school to work or postsecondary education; minimize redundant services; and maximize resources in both systems.

Develop and provide common trainings and professional development opportunities to improve transition and employment results.

Provide a copy of this Agreement to the following key stakeholders:

all LEA superintendents

all directors of Special Education

all VR administrative staff to include branch managers

all OCB administrative staff to include policy and program officials

all Tribal VR Directors

the State Rehabilitation Council

all Brokerage Directors

the Office of Developmental Disabilities Services

the Oregon Developmental Disabilities Council

other entities as identified.

Mutually develop and distribute notices, memorandums and other information regarding transition to key stakeholders.

Give timely notice to key stakeholders of all proposed changes to rule or policy that relate to youth transition.

Collaborate toward meeting the unique needs of LEAs, VR, and OCB offices and facilitate seamless transition for students with disabilities from a FAPE to the provision of vocational rehabilitation services.

In collaboration with LEA's provide, or arrange for the provision of, Pre-ETS for all students with disabilities in need of such services who are eligible or potentially eligible for services under the WIOA.

Additionally, financial responsibilities are outlined as:

In collaboration with ODE, VR and OCB will provide, when appropriate, in- service training available to LEA staff, VR field staff, OCB staff and TVR Programs around topics or issues that are designed to improve the effectiveness of transition services and employment outcomes for students with disabilities.

LEA's will be responsible for the development of the IEP, including appropriate "transition services" and associated costs and other IEP- related services that are not generally available to all students through VR and OCB services.

VR and OCB will be responsible for the development of the IPE; related community based technical/occupational skill training and associated costs, assistive technology devices, and other IPE-related services that are not generally available to all students through the LEA. If the student is a federally recognized Native American Alaska Native student, VR and OCB will partner with the TVR in the identified service-delivery area to provide culturally relevant services.

VR and OCB services are available to applicants to the degree needed to establish eligibility, and for eligible individuals to determine the scope and nature of services and then the provision of those services. While VR and OCB bares primary financial responsibility for these services, VR and OCB will utilize comparable benefits when it will not impede the progress of IPE activities. If the student is a federally recognized Native American Alaska Native student, VR and OCB will partner with the TVR in the identified service delivery area to provide culturally relevant services.

### D. Procedures for outreach to and identification of students with disabilities who need transition services.

OCB is able to develop relationships with youth and their parents, starting at age 14, who experience a visual disability, providing a vocational context within the IEP and 504 Transition Team discussions. This ensures there is an important link to identifying the individualized skills needing to be addressed in order for the youth to be prepared for adult life after graduation.

OCB's formal agreement with the Oregon Department of Education assists in the dissemination of agency information and identification of potential transition aged students with disabilities who need transition services. Further, in Oregon there is a statewide Regional Service Provider system for Teachers of the Visually Impaired that provide services to in school youth who are blind. These teachers assist in the early identification of students who experience a visual disabilities and who need transition services, and help facilitate the agency's involvement in the IEP process.

OCB promotes outreach to and identification of students with disabilities who are in need of transition services for transition planning (including Pre-ETS) beginning when the student turns 16, however, may begin when the student turns 14. Outreach to these students will include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals. Outreach activities can include the use of brochures, social media, attendance at back to school nights, group orientations, and transition events. Agencies will obtain, when necessary, a release of information from parent or guardian to assist in coordinating services.

OCB Transition VRCs are additionally trained on procedures for working with potentially eligible youth to ensure youth throughout the state are able to access Pre-ETS in their area. Often through the partnership established by the Transition VRCs and the Regional Program Teachers, early identification and consultation of eligible youth for Pre-ETS & VR Services are established/provided.

OCB transition counselors provide youth with Pre-Employment Transition Services and counseling/services/programs to aid in preparation for transitioning to post-high

school/college/employment. Individuals who are blind/low vision, who have early exposure to adaptive skills training, vocational exploration and active socialization have a head start to becoming functional, employed and fully integrated adults. The OCB knows not all learning can take place in the classroom, and therefor offers Summer Work Experience Programs (SWEP) to complement the learning that is available through the public education system. These pre-employment transition programs serve to give each participant a safe environment to discover their vocational aptitudes, develop confidence in adaptive skills and encourage self-advocacy and independence. These pre-employment transition programs (offered in the Summer) are a key to the agency's success in quality of employment outcomes for students with vision loss.

OCB offers a five-week entry/foundational program and a six-week more advanced program each Summer. Each program offers paid employment experiences based on student interests, experience and ability. The residential living component of the program provides students the opportunity to refine their daily living skills often for their first time away from home and without parental supports: students plan, purchase and prepare their meals; manage their finances; develop/enhance time-management skills; and maintain a clean and organized living environment in a dorm setting. They also develop and practice independent travel skills and navigation and the use of public transportation by travelling to work and other locations (e.g. grocery stores, banks, restaurants, etc.). Community speakers and student-planned activities encourage deeper integration into the community and refine skills in selfadvocacy and independent living.

Pre-employment Transition Services: While OCB has had a long history of providing strong vocational counseling & guidance and progressive core pre-employment transition services and activities for students with visual disabilities, the costs for these activities as they exist will not come close to meeting the required 15% set aside of the federal grant. OCB's goal is to continue expanding upon our existing Pre-ETS and work experience programs by increasing capacity for the existing programs and developing new opportunities for pre-employment workshops, peer mentorship, and career and work experiences throughout the year.

Our challenges will include identifying appropriate service providers and educational partners that will be able to serve our small, low-incidence population with the specialized skills and tools they require. We will seek to identify and implement appropriate curricula and activities that meet the required five pre-employment transition services. We will be in discussion with educational staff and families to explore how to effectively allocate time for successful completion of rigorous academic requirements, practice of essential adaptive skills, and beneficial work experiences. The agency is looking at options for spending a portion of its required set-aside Pre-Employment Transition Service dollars on authorized activities in order to build capacity.

### 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.

OCB has established a number of formal and informal cooperative agreements with non-profit organizations to enhance services and resources available to OCB clients and business partners.

National Federation of the Blind of Oregon (NFBO) & American Council of the Blind (ACB) – OCB collaborates and shares information with consumer groups with a focus on vision loss in Oregon to promote opportunities for our participants, partner around shared issues related to blindness, and to solicit input for consumer priorities and expectations in service provision. The agency actively encourages and supports agency participants who are new to blindness and staff in attending state consumer conventions in order to broaden exposure to issues of blindness and consumer perspectives.

Helen Keller National Center (HKNC) - OCB regularly collaborates with the Helen Keller National Center (HKNC). The Helen Keller National Center is a resource for OCB on Deaf-Blind resources and

can provide contracted services to OCB participants as well as trainings for OCB staff for working effectively with clients who are Deaf Blind. We have a MOU with HKNC that outlines on-going engagement and collaboration strategies.

The National Employment Team (NET) – OCB has an active relationship and partnership in the activities of the NET, connecting agency participant talent to businesses that understand the importance of inclusion of people with disabilities into their workforce. OCB is represented as a single point of contact for NET activities.

Northwest Association for Blind Athletes (NWABA) - OCB engages with Northwest Association for Blind Athletes in order to provide clients with exposure to social and environmental experiences that prepare them for dealing with challenges and opportunities in both independent living and work

Blindskills, Inc.: OCB has an on-going partnership with Blindskills, which distributes information to young people and their families through a nationally distributed magazine. Subscribers learn about how successful persons with vision loss accomplish their work, participate in recreational activities and enjoy engaged and fulfilling lives. OCB also uses Blindskills, Inc. for community resources and blindness related supports for clients.

Easter Seals, Latino Connection Program: OCB works collaboratively with the Latino Connection program, which provides training/education to Latino and non-native English speaking participants focusing on employment. Their program consists of bilingual English-Spanish staff members who utilize program resources to support translation and interpretation services to persons who do not speak English as their first language and to assist them in their training and job placement efforts. They serve non-English speaking job seekers with disabilities in multiple locations throughout Oregon.

Centers for Independent Living (CILs): OCB works collaboratively with CILs throughout Oregon both formally and informally to benefit our mutual clients. CILs provide CRP services to our clients under the RFA and also provide benefits planning and the full breadth of CIL services to clients via referrals from, and collaboration with, OCB.

## 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.

OCB provides Supported Employment services to individuals with disabilities co-occurring with visual impairment that make long-term supports necessary for the individual's success in maintaining integrated and competitive employment, including developmental disabilities, traumatic brain injury (TBI) and disabilities due to mental health.

OCB believes that all individuals are capable of integrated and competitive work with the right supports in place, and the state has over the years reduced options for sub-minimum wage employment. The new regulations requiring the agency to provide pre-employment transition services for youth with disability before certification for sub-minimum wage work is expected to have little impact on the agency, as this is the direction the state has been moving towards. A challenge for supported employment is that the comparable benefit resources available in Oregon State to provide extended long-term support services are limited. OCB works in collaboration with all available resources and partners on cases that have co-occurring disabling conditions that make long-term supports necessary. The OCB continues to work with employers and other natural supports to identify funding for long-term support services.

In Oregon, the Department of Human Services provides funding for extended services for individuals with the most significant disabilities. This funding is routed through County Developmental Disability Agencies via a client's Case Manager, and is contracted for each individual through Brokerages. These agencies work with the individuals and their social support systems to develop a plan for ongoing supports, which can be used for a variety of purposes, one of which are long term employment supports.

Training and post-employment services that will lead to supported employment are provided by OCB. Once the individual is transitioned from agency vocational rehabilitation support, another agency or resource provides extended services. Services we provide include: the provision of skilled job coaches who accompany the worker for intensive on the job training, systematic training, job development, follow up services, regular observation or supervision at the training site, rehabilitation technology, and other services needed to support the individual in successful employment.

Community Rehabilitation Providers (CRPs). OCB contracts with private, for- and not-for-profit Vocational Rehabilitation service providers for general and supported employment services. The most commonly purchased CRP services include: vocational evaluation, trial work experience, job placement and job retention.

Community Rehabilitation Program providers are qualified through a Request for Application (RFA) process. All vendor staff must pass a federal background check and be vetted through our application process.

OCB also uses this RFA process for vendors who provide services such as Rehabilitation Teaching, Orientation & Mobility and Assistive Technology training. Prior to permitting direct-unsupervised access with agency participants, including supported employment participants, all vendors/providers of services are required to complete and pass background checks. In requiring both the technical qualification process and the criminal background check of providers, OCB has taken the necessary steps to ensure that when agency participants choose to utilize community providers, they can count on safety and quality services for our clients.

In addition, the OCB is included in the Integrated Work Plan for Individuals with Intellectual and Developmental Disabilities. The Oregon Department of Human Services (DHS) along with its many partners and stakeholders, strives to support the choices of individuals with intellectual and other developmental disabilities (I/DD) and their families within local communities by promoting and providing services that are person-centered and directed, flexible, inclusive and supportive of the discovery and development of each individual's unique gifts, talents and abilities. Oregon is committed to work toward service options that ensure people with I/DD have the opportunity to live lives that are fulfilling and meaningful.

### g. Coordination with Employers

Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

### 1. VR Services; and

OCB knows that given the unique needs of our clients, a robust employer engagement model is required to be successful. OCB employs a Progressive Employment Model which is a dual customer model approach that serves both OCB clients and businesses as customers.

OCB uses Job Placement contractors to identify individual employment, assessment and training opportunities as well as Progressive Employment opportunities for those who require those services to become employed. OCB provides extensive training to contracted Job Developers and Job Coaches to help improve their understanding of the context, issues and supports available for people experiencing vision loss.

Additionally, OCB strives to expand the base of employers who work with our clients who do not require individualized outreach to employers. By leveraging opportunities with other workforce partners, OCB believes that it can increase employment opportunities for Oregonians with disabilities and change the perception associated with individuals with disabilities in the workforce.

OCB has implemented a statewide Workforce Team that provides services to Oregon businesses and is composed of 1 full-time Workforce Manager, 3 full-time Business Engagement Specialists (1 dedicated to Transition Youth/Pre-ETS) and 5 full-time Assistive Technology Specialists. This team supports each of the local field offices in the activities detailed below:

The OCB Workforce team partners with:

Regional Employment Department business teams to coordinate employment services, employer recruitment events and job fairs, regional business events to enhance disability awareness

Local workforce development boards (LWDB) to coordinate employer engagement activities

Internal VR staff to keep them informed of the latest news regarding apprenticeship programs and processes, 503 protocols and processes, and Regional Business Relations Communications

Local mental health providers to coordinate employment services

Oregon Vocational Rehabilitation (the state's general agency) Workforce and Business Coordinator on collaborative employer outreach

Local employer engagement events and activities for individuals with disabilities

Community Rehabilitation Partners to provide Job Development and job coaching services

OFCCP by leveraging our partnership to best service businesses 503 recruitment needs and establish local MOU's with federal business contractors

Businesses and partner agencies to provide local trainings and resources on disability awareness and blind etiquette, quarterly Business Outreach Newsletter, accommodations, develop opportunities for company tours, job shadows, informational interviews, internships and work experiences for OCB clients. Additionally, the OCB Workforce team provides consultation around accommodations, diverse recruitment strategies, work site assessments, assistive technology assessments and recommendations

Local nonprofits that provide employment services

OVRS SRC Business/ Committee Outreach Committee, as an ad hoc member, to develop a new platform for business facing disability related partnerships

OCB is actively engaged with the National employment Team (NET). The national network of the 80 public Vocational Rehabilitation (VR) programs supports a united or "one company" approach to working with business customers. The 80 VR Directors have each named a business consultant that functions as the designated point of contact for their agency. These 80 points of contact, through CSAVR leadership and support, form the National Employment Team or The NET.

OCB has a strong working relationship with The NET Business Relations Director, Kathy West Evans, who provides local introductions to NET Business partners throughout the State. OCB also participates in National Team calls, Regional Team calls and attended the 2019 NET Summit. OCB will continue working with NET one evolving strategies for engaging businesses, including the Model State Employer program.

Examples of business relationships established based on OCB's involvement with The NET include: Amazon, Xerox, Apple Care Call Center, Sprint Call Center, Wells Fargo, CVS, Starbucks, Walgreens, Intel, Microsoft, and Hewlett Packard (HP).

A strategy OCB uses with state and national employers is Progressive Employment (PE). The PE model used by OCB is based on the Vermont Progressive Employment model, and replicated in

Oregon with assistance from JD VRTAC and University of Massachusetts, Boston. PE expands uses a selection of career exploration tools and approaches and a dual customer strategy to create career exploration opportunities that lead to competitive, integrated employment opportunities that are right for each individual client and business partner. PE packages readily available VR pre-employment options and coordinates rehabilitation counseling, job placement, and business account management to ensure that both jobseekers and employers benefit.

PE is a low risk model for employers that allows them to get to know a candidate as a person and a worker prior to making a hiring decision, and allows career exploration opportunities for the client. Some PE activities include: Company Tours, Job shadows, mock Interviews, informational interviews, work assessments, and work experiences.

## 2. Transition services, including pre-employment transition services, for students and youth with disabilities.

OCB employs a Progressive Employment (PE) Model which is a dual customer approach that serves businesses as an identified customer alongside clients. PE expands a selection of career exploration tools and approaches and a dual customer strategy to create career exploration opportunities that lead to competitive, integrated employment opportunities that are right for each individual client and business partner. The PE model supports the Pre-Employment and Transition Services "Required Activities" by engaging businesses in Career Exploration, Post-Secondary Opportunities, Workplace Readiness, Work-Based Learning Experiences, and Self-Advocacy activities such as company tours, job shadows, mock interviews, informational interviews, work assessments, apprenticeship opportunities, and work experiences.

Transition and Pre-Employment Services make use of the PE model by engaging employers in career exploration and workplace readiness activities that increase employer awareness of OCB and supports provided through our Transition/Pre-ETS services, fostering long-term business relationships and supporting youth experiencing vision loss in gaining the skills necessary for integrated competitive employment.

Through the annual Summer Work Experience Program (SWEP), OCB connects with employers to provide the opportunity to host youth interns for four to five weeks and engage with OCB in a variety of other job exploration activities such as mock career fairs, informational interviews, and employer panels. Through the immersive SWEP experience, OCB is able to build robust personal relationships with businesses while making them aware of the emerging and historically underutilized labor pool that youth with disabilities represents in Oregon.

OCB collaborates with a diverse array of partners across Oregon to engage with businesses in rural and underserved communities in providing PE/Pre-Employment activities. These partners include youth internship programs in local chambers of commerce or economic development organizations, regional transition networks, Oregon Employment Department business teams, non-profit organizations, and post-secondary educational institutions. Working with these partners and more, OCB engages businesses by organizing reverse job fairs, industry tours, and other innovative activities that connect businesses to clients in geographically remote locations across Oregon.

The OCB Transition/Pre-ETS team engages with job placement professionals, community rehabilitation partners, transition specialists, and educational partners to utilize a combined expertise and network of business partners through collaborations such as MEET 1<sup>st</sup> (Multnomah Education and Employment Team), the College Readiness Collaborative, Employment First, and local workforce boards.

OCB strives to expand the base of employers who work with our clients who do not require individualized outreach to employers. By leveraging opportunities with other workforce partners, OCB believes that it can increase employment opportunities for Oregonians with disabilities and begin to change the perception associated with individuals with disabilities in the workforce.

### 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;

OCB collaborates with the Department of Human Services (DHS), Seniors and People with Disabilities (SPD), Developmental Disability Services (DDS) and Community Rehabilitation Provider (CRP) brokerages throughout the state of Oregon. OCB will continue to explore and build opportunities for additional and enhanced collaboration, coordination of services, and better understanding of the scope and role of Medicaid in promoting success for individuals who require long-term employment supports. OCB will develop an improved understanding of the role of Medicaid for vocational services under an Order Of Selection scenario (though we are not in Order Of Selection currently).

## 2. The State agency responsible for providing services for individuals with developmental disabilities; and

OCB is committed to collaboration with DHS, SPD, DDS and brokerages throughout Oregon in order to prioritize long-term supports for employed individuals, and for detailing means for collaboration, coordination of services, and mutual understanding of scope and role of each agency in promoting success for individuals who require long-term employment supports.

OCB is included in the Integrated Work Plan for Individuals with Intellectual and Developmental Disabilities. The Oregon Department of Human Services (DHS) along with its many partners and stakeholders, strives to support the choices of individuals with intellectual and other developmental disabilities (I/DD) and their families within local communities by promoting and providing services that are person-centered and directed, flexible, inclusive and supportive of the discovery and development of each individual's unique gifts, talents and abilities. Oregon is committed to work toward service options that ensure people with I/DD have the opportunity to live lives that are fulfilling and meaningful.

## 3. The State agency responsible for providing mental health services.

OCB is committed to collaborating with mental health services throughout Oregon in order to insure collaboration, coordination of services, and mutual understanding of scope and role of each agency in promoting success for individuals who require long-term employment supports.

Although we have no formal agreement in the provision of mental health services, the agency has been able to be effective in the individualized coordination of services on a case by case basis in the event we have a client who is blind who is also a client of that system.

### i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development

Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

### 1. System on Personnel and Personnel Development

#### A. Qualified Personnel Needs

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

i. The number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

The agency has a total of 15 vocational rehabilitation counselors. a) 11 are caseload-carrying positions b) 1 is a career exploration counselor with a small caseload c) 3 are counselors who specialize in working with employers to enhance employment outcomes and do not carry formal caseloads. The ratio of clients served to VRC (full caseload carrying) FTE in FFY was 57:1 (including potentially eligible/Pre-ETS clients). OCB reviews and analyzes qualified personnel needs on an ongoing basis to ensure quality service provision.

### ii. The number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

The agency hired three new Counselors in FFY 19 (one for business relations/not case carrying and two to replace VRCs who exited for other employment opportunities), Two of whom were VRC interns prior to hiring. We have been successful in being able to recruit (as needed) and retain vocational rehabilitation counselors and expect this trend to continue. The agency believes that we will be able to serve all eligible individuals with the current number of vocational rehabilitation counselors on staff and in the pipeline from our primary educational partners over the next five years. We are confident we will also be able to serve all eligible clients over the next five years (given our successful retention and recruitment methods historically).

iii. Projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

The agency hired three new Counselors in FFY 19 (one for business relations/not case carrying and two to replace VRCs who exited for other employment opportunities), Two of whom were VRC interns prior to hiring. We have been successful in being able to recruit (as needed) and retain vocational rehabilitation counselors and expect this trend to continue. The agency believes that we will be able to serve all eligible individuals with the current number of vocational rehabilitation counselors on staff and in the pipeline from our primary educational partners over the next five years. We are confident we will also be able to serve all eligible clients over the next five years (given our successful retention and recruitment methods historically).

### B. Personnel Development

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

i. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

Staff Development & Plan for recruitment Western Oregon State University (WOU) and Portland State University (PSU) are the only two graduate programs in the state of Oregon that provide VR professionals with master's level training/education.

ii. The number of students enrolled at each of those institutions, broken down by type of program; and

WOU currently has thirty-two total students in the Masters of Rehabilitation Counseling program twelve of whom are in the Masters of Rehabilitation Counseling for the Deaf track.

PSU currently has forty-one students enrolled in their Masters of Rehabilitation Counseling program.

iii. The number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

In 2019 WOU graduated fourteen Rehabilitation Counselors and two Rehabilitation Counselors Deaf track (eight took the CRC exam and six passed). PSU graduated seven VR Counselors (all took/passed the CRC exam).

## 2. Plan for Recruitment, Preparation and Retention of Qualified Personnel

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

OCB actively works with PSU and WOU graduate programs in Vocational Rehabilitation. All OCB counseling staff meet the state/agency's CSPD standards as they have all either earned a Degree in Vocational Rehabilitation Counseling or a related field or possess a valid Certified Rehabilitation credential/certificate.

### 3. Personnel Standards

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

A. Standards that are consistent with any national or State-approved or recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and

OCB plans to continue to hire qualified Masters in Rehab Counseling or CRC certified VR counselors wherever possible. We recognize that the lower standards through WIOA may impact the agency's ability to meet the internal CSPD standards, and we will continue to monitor availability and continued quality of candidates with that certification.

B. The establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.

We are hopeful we can maintain the high caliber of professionalism that the CRC and Masters level training provides our counseling staff. The OCB actively coordinates with WOU and PSU for recruitment of talent. The agency maintains a broad recruitment mailing and website posting list, which we use to advertise vacant vocational rehabilitation positions. Recruitment information is also posted on Oregon State's job posting website and on several other web sites and list-serves that support rehabilitation professionals.

### 4. 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. 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

The agency promotes a positive atmosphere, and makes every effort to provide staff with clear and consistent communications regarding performance expectations, agency decisions and agency initiatives. Recruitment of a diverse staff is important for the agency - we want our staff to be representative of the customer base and communities we serve. Five OCB staff are fluent in ASL, including four VR Counseling staff that are able to directly communicate with deaf blind participants. The agency's biggest recruitment challenge stems from the fact that Oregon has limited local training programs for both Rehabilitation Teachers and Orientation & Mobility Specialists. OCB is committed to staff development and training whenever possible and appropriate.

# B. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

OCB has options for development of internal Rehabilitation Teacher/Orientation & Mobility staff through internal staff training & development, and we have taken advantage of this option for training/promoting staff in order to meet agency needs.

Staff Training & Development: OCB's Training Plan for Rehabilitation describes how the agency assesses and prioritizes ongoing training needs through input from the following sources:

1. Staff training needs: Staff training needs are evaluated annually during performance reviews and the agency actively supports staff development in order to insure personal/professional growth for each of our valued employees. Specific development and/or training needs are identified for each employee, by the employee and supervisor, and are addressed throughout the following year.

2. External factors: Results of audits, evaluations, state and federal compliance reviews, and agency case reviews identify critical areas that need to be addressed through staff training and provide the basis for our biannual and annual VR Program Trainings.

3. Changes to work: Implementation of new policies or procedures; new work tools implemented, changes the agency effects on the work provide new needs for training.

4. Planned change: Strategic Plan priorities and objectives requiring training as part of implementation. The executive Team and training coordinator plan the agency's annual training agenda and prioritize the training needs of agency employees. Specific training needs of counseling staff and other VR professionals are primarily being met through the utilization of training resources within the agency/state with occasional support being secured through national workshops and conferences.

The agency conducts credit earning workshops in rehabilitation at least once a year (during all-staff training) and for VRCs, two (2) times a year (VRC Spring training and all-staff). The agency's involvement with the Region X Technical Assistance Center through the University of Washington continues as the region's VR agencies have developed a membership dues system in order to continue to enhance staff and management development through their training services. OCB will continue to utilize internal training as well as regional training resources including: Region X Technical Assistance Center at the University of Washington, the general VR agency's trainings/in- services and private organizations and agencies for various rehabilitation related topics. OCB has a designated staff person to facilitate securing staff CEUs for various internal and/or external trainings.

Staff primarily attend in-state and some out-of-state trainings and conferences, such as the American Education & Rehabilitation (AER) Conferences, Council of State Administrators of Vocational Rehabilitation (CSAVR) & National Council of State Agencies for the Blind (NCSAB).

OCB supports Rehabilitation Teacher/Orientation & Mobility staff in securing the required continuing education CEUs to maintain their certification. We have supported staff in developing and securing formalized training in areas of Low Vision assessment, updated Orientation & Mobility concepts, and ethics. The agency Rehab Teachers meet via phone each month to provide peer training and share resources (more extensive training and resource sharing occurs annually at all-staff).

While currently there are no credential requirements for the agency's Adaptive Technology Specialists, it is an agency responsibility to ensure staff maintains up-to-date training and competence in assessment and training of adaptive tools as technology rapidly changes. The agency regularly provides staff time for vendors to demonstrate new products and staff to provide peer training on devices. AT staff are committed to reading technology and industry journals and reporting new information on adaptive technology devices to their peers.

### 5. Personnel to Address Individual Communication Needs

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

Personnel to address individual communication needs State and agency policies, procedures and community resources ensure that applicants and recipients of program services who have limited English speaking ability are provided with the appropriate mode of communication to fully benefit from public VR services. Some of our staff members speak diverse languages such as Spanish and American Sign Language. Where it makes sense to do so, staff is able to communicate directly with customers and community members in their native or preferred language. Five (5) staff speaks ASL and one (1) speaks Spanish. Where it does not make sense to rely on staff language skills, or where we do not have access to those skills, agency staff access community resources to communicate with diverse populations. Individuals who are Deaf- Blind or Hard- of- Hearing/Blind may communicate with staff via voice relay service. American Sign Language (ASL) interpreters are utilized when needed for

in- person meetings, trainings or events. Bi-lingual WIOA partner staff are accessed to assist OCB clients as they engage with WorkSource Oregon (WSO) services as needed and appropriate.

OCB continues to employ personnel who are familiar and confident in the use of an array of communication modes to fully benefit the recipients of the program based on the preferred method of communication of the customer.

## 6. Coordination of Personnel Development Under the Individuals with Disabilities Education Act

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

Coordination of professional development under IDEA Agency staff who work with transition-age youth coordinate transition activities throughout Oregon to teachers of the visually impaired and other Special Education personnel. These staff work with regional staff to ensure customers receive services and information necessary to facilitate a smooth transition from high school to adult services. Based on assessments and training provided by OCB, OCB staff provide recommendations and information to regional programs, parents and students about vocational rehabilitation services including availability of services as potentially eligible students, referral to the full array of services, and eligibility requirements that support a coordinated transition plan from high school to post-school services.

Consultation is also provided as early as necessary to special education staff regarding IEP planning and development. OCB staff shares data and reports relevant to program development and planning with partners as appropriate and necessary.

### j. Statewide Assessment

# 1. Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:

### A. With the most significant disabilities, including their need for supported employment services;

The Oregon Commission for the Blind VR Program serves individuals who meet the legal definition of blindness (medical report documenting visual acuity of 20/200 or less, a visual field of 20 degrees or less). All Oregonians who are legally blind would be considered to have "the most significant disabilities."

Estimating the number of Oregonians with legal blindness is not easy or straightforward. At best, we can extrapolate from the American Community Survey estimates for Oregonians who self-report experiencing "vision difficulty, even when wearing glasses." The prevalence of "vision difficulty" in Oregon is 2.2%, which represents an estimated 86,000 Oregonians over the age of 16, or broken out by age group as follows:

Youth and students transitioning from high school to postsecondary education or employment experience vision loss with a low prevalence of 0.9% which impacts 2,350 young adults (16 - 20 year olds) – estimated to impact a larger group of men (1,600) than women (700).

Working age adults (21 to 64) experience vision loss with a prevalence of 1.9%, totaling 45,200 individuals

Older adults' (65-74) vision loss prevalence is 3.9% which consists of 16,700 adults

Vision difficulty increases dramatically for adults over 75 with a prevalence of 8.3% affecting 22,100 older Oregonians1 – roughly 13,500 women and 8,500 men.

The population the Oregon Commission for the Blind will likely serve is serve through its vocational rehabilitation program is smaller.

Vision Loss and Work:

Americans between 16 and 64 who report a visual difficulty consisted of one-third employed, about 10% unemployed (but in the labor force), while 64% are not in the labor force at all. Compared with the general population, unemployment is twice as large while fewer than half of people reporting a visual difficulty are employed. (Bureau of Labor Statistics, 2016 via McDonnall 2017). For reference, the employment rate among sighted Oregonians is 80%, or about 1.65 Million working adults while for Oregonians with a disability this rate is 37% (MOE +/- 2.1). (The employment rate for Oregonians with vision difficulty is not statistically different than the employment rate for Oregonians with disabilities). However, it's important to note that statistics for employment rate or unemployment for individuals who are legally blind are not available.

Estimated VR Target Population:

The following is a conservative estimate based on Oregonians with vision difficulty in the labor force but unemployed (based on 2017 ACS estimates of Oregonians with vision difficulty and 10% of Americans reporting vision difficulty and meeting unemployed definition):

Youth and Young Adults: 2,350 \* 10% = 235

Adults: 21 to 64 and Vision Difficulty: 45,200 Oregonians \* 10% = 4,520

65 - 75: 16,700 Oregonians \* 10% = 1,670

Total = 6, 155

For reference, the Oregon Commission for the Blind has provided services for 1068 unduplicated individuals in PY16, PY17 and PY18 through OCB's VR Program.

#### Poverty and Public Supports:

Oregonians 21-64 with vision difficulty experience higher levels of poverty than the population, and utilization of public supports resembles other Oregonians with disabilities:

Of Oregonians with vision loss, an estimated 32.8% ( $\pm$  6.89) lived in poverty in 2017 (14,700 Oregonians with vision loss). This figure is not statistically different than the estimate for adults with any disability 28.3% ( $\pm$  2.67), however, both figures are substantially higher than the population without any disabilities which is 10.7% ( $\pm$  0.66).

SSI: 18.2% ( $\pm$  1.68) of Oregonians with disabilities received SSI in 2017. The figure is not statistically different for Oregonians with vision loss, which is 17.8 %( $\pm$  4.14).

From the 2017 completed CSNA on Supported Employment:

For individuals who need ongoing assistance in order to maintain a job, the Commission works with a variety of partners to provide supported employment. As a result, supported employment often requires more direct collaboration with community partners. The partners develop a team and plan of action including who is going to provide ongoing support. The goal for individuals is to be able to work in the community earning at least minimum wage.

Staff uses a variety of job search techniques for individuals requiring supported employment, including job carving and tailoring jobs to the individual. Job opportunities are developed as needed, based on each person's resources and strengths. Staff make recommendations for employers, purchases specialized equipment, or adapts equipment so that it works for the individual.

A vital strategy for supported employment is the use of Job Coaches. Particularly for individuals with the most complex disabilities, a place- and- train model in which individuals spend time training on the job tends to lead to success. The Commission hires Job Coaches to work alongside the individual until he or she learns the job. Job Coaches may work constantly alongside the person or check-in a few times a day or weekly as needed. Generally, when Job Coaches are needed for the long term they are funded through the local county. Counties provide supported employment for Survey respondents provided feedback regarding the Commission's services for individuals who are blind and experience the most significant disabilities. The feedback indicated that people experiencing multiple, significant disabilities often need support from multiple providers. This requires a great deal of coordination and oversight of service delivery.

Overall OCB client feedback on VR services from the completed 2017 CSNA indicated 93% of OCB clients achieving an employment goal rated the overall quality of the commission's services as "excellent (74%) or good (19%).

#### B. Who are minorities;

First phase of analysis of the Oregon population compared with recently served clients, shows the Commission is moving towards successfully reaching Oregonians of various race and ethnic backgrounds. The following compares VR clients served in PY 2017 and PY 2018 to the 2018 U.S. Census Estimates of Oregon demographics:

Native American: Commission served 5.3%, Oregon population 1.8%

Asian: Commission served 4.6%, Oregon population 4.8%

Black or African American: Commission served 5.3%, Oregon population 2.2%

Pacific Islander: Commission served 1.8%, Oregon population 0.5%

White: Commission served 85.1%, Oregon population 86.8%

Hispanic: Commission served 11%, Oregon population 13.3%

The 2017 CSNA identified gaps in serving Native American and Hispanic Oregonians. It appears the Native American service gap has closed while the Hispanic service gap persists only moderately.

This analysis is quantitative and does not address disparities in cultural competency or service quality, topics for continued research.

New Research on Race and Blindness:

OCB has the unique advantage of being located near one of the leading centers in eye research. In 2018 the Casey Eye Institute analyzed OCB's Blind Registry data dating back to 1961 in order to explore the leading causes of vision loss. Major findings include:

Race and ethnicity are associated with different patterns of vision loss.

The majority of blindness for white Oregonians is due to AMD, Black and Asian Oregonians from glaucoma, while for Hispanic, Native American and Pacific Islander Oregonians Diabetic Retinopathy is especially common.

Since glaucoma and diabetic retinopathy are associated with younger onset of blindness, the mean age of onset of blindness was younger for Black Oregonians (31 years) and Hispanic Oregonians (33 years) than white Oregonians (44 years).

Finally, "one at-risk group for blindness identified by these data are Hispanics in Oregon with diabetes. While the prevalence of systemic diabetes was 15.4% in Hispanic and 21.9% in Black populations, 21% of Hispanics versus 9% of Blacks 40 years and older experienced blindness from DR. This may reflect the impact of geographic barriers to care as many of Oregon's Hispanics reside in rural areas where there are few ophthalmologists. In contrast, most Blacks in Oregon reside in the

state's largest urban area near the highest density of state eye care resources and lost vision most frequently from glaucoma. This juxtaposition suggests the potential value of programs to improve access and awareness efforts among specific population groups.

This research combined with the service gap for Hispanic Oregonians suggests particular attention and increased outreach to reaching this group.

The following is corresponding historical data from the completed 2017 CSNA. It is based on 2012 US Census data, and PY13 – PY 16 OCB client data:

Native American: Commission served 6%, Oregon population 1.8%

Asian: Commission served 3%, Oregon population 4.0%

Black or African American: Commission served 3%, Oregon population 2.2%

Pacific Islander: Commission served 2%, Oregon population 0.5%

White: Commission served 93%, Oregon population 77.8%

Hispanic: Commission served 8%, Oregon population 12.2%

#### C. Who have been unserved or underserved by the VR program;

The Oregon Commission for the Blind conducted surveys in fall 2019 to stakeholders, including staff, commissioners, contractors, partners and clients. Questions included: "who might be underserved by the Commission's VR Program?" The top results from the question "to which groups could OCB provide better services - select three?" included responses for individuals experiencing vision loss in addition to additional groups, such as:

Living in rural areas - 30%

Older (working) adults - 27%

Mental health barriers - 27%

Traumatic Brain Injuries - 18%

Intellectual and developmental disabilities - 16%

Deaf-blind - 14%

Homelessness - 14%

Students or young adults – 12%

Autism – 11%

The same type of questions were asked of respondents in the completed 2017 CSNA. Respondents were not limited to three responses (N=55):

People who live in rural areas of the state 72%

People with mental health conditions 67%

People with intellectual disabilities 40%

People who are from racial or ethnic minority groups 38%

People who have criminal convictions 45%

People who are between the ages of 16 and 21 30%

People with a substance abuse disorder 40%

People with physical disabilities 23%

Rural Outreach - Individuals with vision loss living in rural areas:

Using data from clients served over the past three years (PY 16 – PY 18), we examined whether and to what extent rural Oregonians might be underserved by the VR program. First, analysis looked at each of Oregon Commission for the Blind's five regional service areas. Compared to the general population in each service area, the ratio of clients served was similar for the Salem, Eugene, and Portland service areas. Redmond (Central and Eastern Oregon) and Medford (Southwestern Oregon) field offices served a slightly lower ratio of VR clients relative to the population in the area:

Salem: 218 clients served/800,925 = .27 (in 000's)

Eugene: 182 clients served/550,130 = .33 (in 000's)

Portland: 509 clients served/1,981,810 = .26 (in 000's)

Redmond: 81 clients served/457,850 = .18 (in 000's)

Medford: 78 clients served/404,585 = .19 (in 000's)

Some possible explanations include the different amounts of rural counties in some service areas, along with older populations in rural areas (less likely to participate in VR), better transportation systems along the I-5 corridor connecting urban counties, and differences in urban and rural economies.

When we look more closely at urban-versus-rural counties, we find that indeed the share of clients served in rural counties does not quite match the share of rural Oregonians:

Urban counties (Portland Metro) represent about 45% of Oregon's population

"Standard counties" (Most counties in the Willamette valley and around major cities) represent about another 35% of Oregonians, and the Commission served about 37% of clients from these counties

Finally, rural counties ("Nonurban counties") account for 21% of Oregon's population, while only 18% of clients served over the past three years were from these counties.

On face, the data corroborate a slight gap in reaching rural populations. However, there are several factors not represented here: 1) quality of services (the Portland office features an on-site training center and the best public transit, for example), 2) the effect of Oregonians with vision loss relocating closer to better transportation systems, opportunities and services. Future analysis should delve more deeply into these dynamics.

In response to the survey question "How might OCB improve services for individuals in rural areas? (Check all that apply)" Approximately 75% say increase outreach, 50% say increase specialized services, 50% say increase training for job development and job coaching, and 25% say increase OCB staff training. Approximately 30% say consider "Other" options, including:

Funding for transportation issues and extra staff

Having an Eastern Oregon Office would make it easier for clients on the Idaho border to be seen more easily

#### Increased vendors/staff

Provide short term concentrated trainings in rural areas

More consistent point of contact at my OCB field office

Travel budget - availability of staff to reach clients

fund transportaction for those who are employed

get more staff in rural areas, more O&M and assistive tech trainers, especially for older blind program

hire more field instructors

(7x) support/expand transportation access

VRC continuing to build partnerships with partner agencies in rural areas

Clients with Complex Needs:

The next group of priorities or potential gaps indicated by survey responses can be examined under the heading "complex needs" – a theme reflected in staff and leadership interviews:

"There seems to be an increase in the number of students that have multiple disabilities, working with more complex needs. [And lack of training]." - Instructors

"You're not finding the people who are just blind anymore – most of the people are blind with something – other disabilities. Most of the time there are secondary disabilities. OCB might be underprepared" – OCB Leadership

Additional disabilities – face even more challenges and more discrimination. Often don't have voice or platform to share that. Probably a significant challenge, even to find the right fit. – OCB Leadership

"Anyone with multiple disabilities appear alienated and underserved" - OCB Staff

The data collected by the agency for quarterly WIOA reporting indicates that at least 50% of clients have a secondary disability (in addition to legal blindness) – approximately half of which are "physical impairments" and half of which are "mental impairments" including psychosocial or cognitive disabilities. OCB leadership also guess this is an underestimation since secondary disabilities might not be disclosed and documented when clients begin services.

For mental health needs: survey response to question "What can OCB do to improve services to individuals experiencing significant mental health barriers? (Choose any that apply)." (n=114)

Approximately 60% say increase OCB staff training, 60% say increase availability of specialized services (such as therapists), 50% say increase outreach about available services, and 45% say increase training for job developers/job coaches.

Several respondents had additional suggestions, including:

Client assistance program

Developing worksites/partnerships with employers who can handle some of the inconsistencies that can come along with Mental Health issues

Partnerships with MH providers

Integrate counselors who specialize in disability as vendors.

Train MH providers about the reality of fears blind person must face. And significant barriers - such as transportation

offer support with referrals to mental health services so patient can address those barriers to increase readiness to engage in OCB, more of a wraparound approach

"I worked in a school where we had a program that would be so good at OCB. We had a program who had trained listeners (not counselors) who could connect folks to resources. It would be nice to have a listening ear, someone who's not a counselor. It's really heavy for counselors. Has to be focused on who it's helping." – Client

The completed 2017 CSNA asked respondents about recommendations for improving services to unserved and underserved populations (n=59).

Public awareness campaign 55%

Increase staff 61%

Staff training to work specialty caseloads 61%

Provide more job skills development training 50%

More interactions with community 50%

Improve agency collaboration 50%

Increase transportation options 52%

Increase diversity of staff 30%

### D. Who have been served through other components of the statewide workforce development system; and

It is uncommon that legally blind Oregonians are served through other components of the statewide workforce development system before receiving services from OCB.

WorkSource Oregon customers experiencing vision loss are not required to indicate whether or not they have a disability, and may self-disclose. This is recoded but not analyzed for types or severity of disability.

To prepare WSO partners to serve customers experiencing vision loss, OCB conducts regularly scheduled Disability Awareness, Disability Etiquette and Assistive Technology demonstrations for WorkSource Oregon partners. This is ongoing work.

Survey responses from the completed 2017 CSNA indicated accessibility to WSO systems as a significant barrier to uptake of services and resources. This applied to OCB staff as well as OCB clients surveyed. With regard to awareness of WSO and its resources, respondents reported the following (n=46):

Awareness of WSO: 50%

Have used services at WSO: 36%

OCB staff referral of clients to WSO: 4%

OCB leverages relationships with Oregon's general Vocational Rehabilitation agency around appropriate referral and basic education about accessibility and serving clients with disabilities generally, in the context of the public workforce system.

## E. Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

Youth and students' survey responses indicate the highest priority needs are 1) better coordination between schools and OCB, 2) increased awareness of OCB services among youth and students, and 3) opportunities to explore job sites, such as job shadows and tours.

All respondents (stakeholders who opted into the survey section with questions on Transition youth) also prioritize better coordination with schools and better information about available resources and services to support employment.

Youth and students with vision loss (n=15):

How might OCB improve VR services for students and youth who experience vision loss? Select your top three choices.

Better coordination between OCB and schools - 87%

Increased knowledge of resources and opportunities to support employment - 33%

Earlier access to Pre-Employment Transition Services (Pre-ETS) - 33%

Earlier access to VR services - 33%

Ensure Pre-Employment Transition Services (Pre-ETS) are available in all regions of the state-20%

Increased expectations for competitive, integrated employment - 20%

Additional opportunities for internships and work experiences – 20%

Increased involvement with families to address expectations and impact of work on Social Security and other benefits – 13%

All respondents (n=80):

How might OCB improve VR services for students and youth who experience vision loss? Select your top three choices.

Better coordination between OCB and schools - 47%

Increased knowledge of resources and opportunities to support employment - 44%

Additional opportunities for internships and work experiences - 43%

Earlier access to Pre-Employment Transition Services (Pre-ETS) - 30%

Increased involvement with families to address expectations and impact of work on Social Security and other benefits – 27%

Ensure Pre-Employment Transition Services (Pre-ETS) are available in all regions of the state-26%

Increased expectations for competitive, integrated employment – 26%

Earlier access to VR services – 25%

Youth and students with vision loss (n=15):

How can employers be more involved with helping students and young adults with vision loss transition to work and/or post-secondary education? Select your top three choices.

Increased awareness of OCB services – 60%

Offer tours and job-shadows at the business site - 53%

Increased knowledge of support services for hiring and retaining individuals who experience vision loss – 40%

Provide more work experiences/internships 40%

Employers as mentors - 33%

Invest in screen reader-accessible software - 33%

Provide information on their business to students (at school or virtually) – 27%

Provide job fairs at schools (mock interviews/application practice) - 13%

All respondents (n=80):

How can employers be more involved with helping students and young adults with vision loss transition to work and/or post-secondary education? Select your top three choices.

Provide more work experiences/internships - 57%

Increased knowledge of support services for hiring and retaining individuals who experience vision loss – 51%

Employers as mentors - 48%

Increased awareness of OCB services - 40%

Offer tours and job-shadows at the business site - 34%

Invest in screen reader-accessible software – 21%

Provide information on their business to students (at school or virtually) - 19%

Provide job fairs at schools (mock interviews/application practice) - 15%

### 2. Identify the need to establish, develop, or improve community rehabilitation programs within the State; and

For individuals who need ongoing assistance in order to maintain a job, the Commission works with a variety of partners to provide supported employment. As a result, supported employment often requires more direct collaboration with community partners. The partners develop a team and plan of action including who is going to provide ongoing support. The goal for individuals is to be able to work in the community earning at least minimum wage.

A vital strategy for supported employment is the use of Community Rehabilitation Providers, Job Coaches and Job developers. Particularly for individuals with the most complex disabilities, a placeand- train model in which individuals spend time training on the job tends to lead to success. The Commission hires Job Coaches to work alongside the individual until he or she learns the job. Job Coaches may work constantly alongside the person or check- in a few times a day or weekly as needed. Generally, when Job Coaches are needed for the long term they are funded through the local county. Counties provide supported employment for those people who need support for the life of the job. In order to establish support, the Commission partners with the State's developmental disabilities programs in order to facilitate the initiation of the process.

We recognize that people experiencing multiple, significant disabilities often need support from multiple providers. This requires a great deal of coordination and oversight of service delivery.

The Commission does use CRPs for specialized placement and job coaching functions specific to the CRPs expertise in those employment areas. In addition, there are specialized programs that provide services related to vision loss such as the Devers and Casey Eye Clinics, and the Blinded Veterans Association.

Because there are very few specific blindness-related CRPs, the Commission works closely with agencies, organizations, and individuals throughout Oregon to make sure that individuals who are blind or visually impaired receive appropriate services, and that other organizations are able to either refer individuals to the Commission for service or to gain information needed from Commission staff in order to serve the individuals effectively and appropriately.

In PY 18, OCB developed and delivered blindness and agency specific onboarding and training activities to all CRP's OCB contracts with. This onboarding covers OCB resources, processes, policies and service delivery. The onboarding also incorporates the perspectives, issues and resources available to Oregonians experiencing vision loss. CRP staff are also invited to weekly, regionally specific Jobsville calls. Jobsville is a part of our Progressive Employment model where CRP's staff client cases with Vocational Rehabilitation Counselors, instructors, Business Relations Coordinators and/or other relevant staff. This consistent opportunity for communication leads to enhanced communication and improved services.

3. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are

#### coordinated with transition services provided under the Individuals with Disabilities Education Act

The Agency has a long history of successful coordination with education officials in order to enhance the service delivery for transition aged students in Oregon. OCB collaborates with a number of partners to coordinate strategic activities to insure positive outcomes for students with vision loss. These services are coordinated with transition services provided under the Individuals with Disabilities Education Act (IDEA) whenever appropriate.

There is active information sharing and coordinated planning between OCB and regional programs, OVRS, education and health care organizations throughout the state. Partners join in planning outreach efforts, coordinate referral of potentially eligible students for VR, and implement process improvements for assessment & training statewide in the areas of daily living skills, orientation and mobility/cane travel, communication skills, technology, vocational aptitudes, interpersonal/social skills, and academic preparation for transition-age students. OCB's application for vocational rehabilitation services begins around age 16 (and as early as age 14), and requires the development of an Individualized Plan for Employment (IPE) for all students within 90 days of eligibility, which matches the timeline for adult services.

OCB's primary services while a student is in high school are outreach, assessment, information & referral, counseling & guidance, and pre-employment transition services in order to prepare for successful transition into post-secondary higher education and career activities. OCB authorizes and pays for any services needed to establish a transition student's eligibility for OCB services, and funds services outside the scope of the school district's FAPE (free appropriate public education) responsibility. OCB collaborates with educational staff and families to ensure students who are blind have early exposure to pre-employment transition services such as career exploration, job shadowing and paid work experiences, and extra-curricular opportunities to more fully develop self-advocacy and independent living skills. OCB transition counselors conduct outreach and ongoing consultation statewide to teachers of the visually impaired, students, families and others in the education community. At around age 16, students who are blind, Deaf/blind, and visually impaired become eligible to apply for individualized vocational rehabilitation services. Case management activities are coordinated by the agency's VR Counselors to provide pre-employment transition services. OCB also coordinates closely with local school districts and regional Teachers of the Visually Impaired (TVIs), to identify students who are blind and visually impaired that are eligible for VR services.

OCB is able to develop relationships with students who are blind/visually impaired and parents, providing a vocational context within IEP and 504 Planning & Implementation Team discussions and ensuring an important link to identifying the individualized skills needing to be addressed in order for the students to be prepared for adult life after graduation.

OCB transition counselors provide students with counseling/services/programs to aid in preparation for transitioning to post-high school/college/employment. Individuals who are blind/low vision who have early exposure to adaptive skills training, vocational exploration and active socialization have a head start to becoming functional, employed and fully integrated adults.

The OCB knows not all learning can take place in the classroom, and therefor offers Summer Work Experience Programs (SWEP) to complement the learning that is available through the public education system. These pre-employment transition programs serve to give each participant a safe environment to discover their vocational aptitudes, develop confidence in adaptive skills and encourage self-advocacy and independence. These pre-employment transition programs (offered in the summer) are a key to the agency's success in quality of employment outcomes for students with vision loss.

Additional Pre-employment Transition Activities: OCB has had a long history of providing strong vocational counseling & guidance and progressive core pre-employment transition services and activities for students with visual disabilities. OCB's goal is to expand upon our existing pre-employment and work experience programs by increasing capacity for the existing programs and

developing new opportunities for pre-employment workshops, peer mentorship, and career and work experiences throughout the year.

The full scope of services authorized for Transition students in supported employment is provided to all transition clients. Each client is evaluated individually to determine his or her eligibility and potential to engage in supported employment.

A supplemental assessment may be provided when a reassessment of the suitability of the placement is warranted, or when there is a change in the individual's medical condition.

If the assessment shows that the student will require ongoing support to sustain acceptable work performance and maintain employment, supported employment is included in the services to be provided in the IPE. The IPE includes collaboration and funding from other agencies or organizations that assist by providing the ongoing support services required. All services provided by the Commission for the Blind are time limited unless the eligible individual and the counselor jointly agree that additional time is required to reach the IPE goal and the individual is progressing toward that goal.

The following services may be provided: 1. Supplemental assessments. 2. Job development and placement. 3. Supported employment services needed to support individuals with the most significant Disabilities such as: a) Intensive on the job skills training and other training to achieve and maintain job stability b) Follow up services to reinforce and stabilize the job placement c) Discrete post-employment services following transition that are unavailable from an extended services provider and that are necessary to maintain the job placement d) Specialized technology devices and training. Training and post-employment services that will lead to supported employment are provided by this agency. The necessary extended support is provided by other agencies. Services we provide include: the provision of skilled job coaches who accompany the worker for intensive on the job training, systematic training, job development, follow up services, regular observation or supervision of the individual at the training site, rehabilitation technology, and other services needed to support the client in employment.

Ongoing supports may be provided by the agency from the time of job placement until the transition to ongoing support. These are services that are needed to support and maintain the individuals with the most significant disabilities in supported employment. Ongoing support services may consist of:

1. Specialized assessments 2. Skilled job trainers at the work site 3. Job development and placement 4. Social skills training 5. Regular observation or supervision of the individual 6. Follow up services such as regular contact with the employer, the individual, etc., to reinforce and stabilize the job placement 7. Facilitation of natural supports at the work site.

Once the individual is transitioned from agency vocational rehabilitation support, another agency or resource provides the ongoing support services.

#### k. Annual Estimates

Describe:

### 1. The number of individuals in the State who are eligible for services

According to the American Community Survey (ACS) from 2018, 2.3% (n=96,733) of Oregonians experience vision difficulty. This number represents anyone potentially eligible for OC services in VR, SE or other programs. This will be the basis for FFY20 service projections of the potentially eligible pool of clients.

### 2. The number of eligible individuals who will receive services under:

#### A. The VR Program;

According to the American Community Survey (ACS) from 2018, 2.3% (n=96,733) of Oregonians experience vision difficulty. This number represents anyone potentially eligible for OC services in VR, SE or other programs. This will be the basis for FFY20 service projections of the potentially eligible pool of clients.

For FFY20, 468 individuals are projected to be eligible to receive services through OCB's Vocational Rehabilitation Program.

#### B. The Supported Employment Program; and

For the Supported Employment (SE) Program in FFY 20, we anticipate serving 50 SE clients based on prior service levels.

C. Each priority category, if under an order of selection.

N/A. Does not apply. OCB is not currently in an order of selection.

#### 3. The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

N/A. OCB is not currently in an order of selection.

#### 4. The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

The cost for services for the number estimated eligible for services is in FFY 20 will be: 468 x \$3,389.88 = \$1,585,463.84. This number is calculated using the projected number to be served in FFY20, multiplied by current cost per client. OCB is not currently in an order of selection.

#### I. State Goals and Priorities

The designated State unit must:

# 1. Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions

The Oregon Commission for the Blind does not operate under the direction of the State Rehabilitation Counsel, but operates as a board-driven agency/commission. The agency's goals and priorities have been identified and discussed in collaboration with WIOA core partners and agency stakeholders through the agency's 2017 CSNA and preliminary 2020 CSNA focus groups and feedback tools, and reviewed and approved by OCB's Board of Commissioners.

The goals and priorities developed by OCB align with concepts and approached identified in WIOA, align with the strategic goals and priorities of the state's Workforce Talent Development Board, and are consistent with OCB's agency priorities and strategic planning

### 2. Identify the goals and priorities in carrying out the VR and Supported Employment programs

Goal 1: Successfully implement the intent of the Workforce Innovation and Opportunity Act into agency work and processes

This goal is a continuation from OCB's submissions to the 2016 Oregon Unified State Plan submission. It remains relevant as an agency priority for continued work in the 2020 Oregon Combined State Plan. This goal aligns with the state of Oregon's Workforce Talent Development Board's Strategic Imperative of Increasing the Understanding and Utilization of the System, and Creating a Culture of Equitable Prosperity. This goal aligns with OCB's strategic goals and priorities. A sub goal addressing transition youth previously in this section from OCB's prior State Plan submission has been expanded to a new primary goal below. A new sub goal has been added to reflect enhanced focus on performance and outcomes.

Sub Goal 1.1: Continue to emphasize the State's Strategy of High Skills/High Wage focus for agency participants.

Sub Goal 1.2: Ensure access for blind, low vision and deaf blind individuals to the array of services available through the state's workforce system.

Sub Goal 1.3: Engage with state and local community businesses in a way that works best for employers, and better prepare agency participants for success by ensuring they have the skills that businesses need.

Goal 2: Increase Agency outreach and effectiveness of services to individuals and communities that would benefit from vocational rehabilitation services

This is a continuation of a goal 2.0 from OCB's 2016 state plan submission and is reinforced by feedback from the 2017 CSNA and preliminary findings from the 2020 CSNA. This goal aligns with the state of Oregon's Workforce Talent Development Board's 2020-2021 Strategic Plan Goals to Increase the Understanding and Utilization of the System, and Creating a Culture of Equitable Prosperity. This goal aligns with OCB's Key Goal of Effective Community Outreach and Education. Sub Goal 2.2 has been added, reflecting feedback from stakeholders around rural outreach.

Sub Goal 2.1: Increase cultural competency of agency staff

Sub Goal 2.2: Raise awareness of OCB resources and services, specifically in rural areas of the state.

Goal 3: Expand Pre-Employment Transition Services for potentially eligible and eligible youth who experience vision loss throughout Oregon.

This goal is an enhancement of a sub-goal from OCB's 2016 state plan. This goal aligns with the State of Oregon's Workforce Talent Development Board's 2020-2021 Strategic Plan Imperative to Increase the understanding and utilization of the system and Create a Culture of Equitable Prosperity. This goal aligns with OCB's Key Goal of Exemplary Service

Sub Goal 3.1: Increase collaboration with local workforce development organizations to promote greater access to apprenticeship, certificate, and similar non-collegiate career tracks to youth experiencing vision loss.

Sub Goal 3.2: Develop creative and collaborative partnerships to increase access to Pre-ETS services for students in rural or otherwise underserved communities.

Sub Goal 3.3: Increase identification of potentially eligible students as early as possible in order to maximize impact of Pre-ETS services, especially as it relates to college and workplace readiness.

Sub Goal 3.4: Maintain consistent communication with secondary and post-secondary education providers to ensure OCB services address current and anticipated technology and skill competencies necessary for post-secondary success in a rapidly changing social and technological environment.

Goal 4: Increase the capacity of Oregon's businesses to hire and retain Oregonians experiencing vision loss.

This goal is an enhancement of a sub goal from OCB's 2016 state plan. This goal aligns with the State of Oregon's Workforce Talent Development Board's 2020-2021 Strategic Plan Imperative to Increase the Understanding and Utilization of the System' and Create a Culture of Equitable Prosperity. This goal aligns with OCB's Key Goal of Exemplary Service and Effective Community Outreach and Education.

This goal represents enhanced activities with Oregon businesses to drive improved employment and career outcomes for Oregonians experiencing vision loss.

Sub Goal 4.1: Expand Community Resource Provider/contracted Job Developer onboarding/training.

Sub Goal 4.2: Expand business understanding of VR employment strategies such as Progressive Employment, CRP development and job carving/job customization strategies and approaches.

### 3. Ensure that the goals and priorities are based on an analysis of the following areas:

### A. The most recent comprehensive statewide assessment, including any updates;

OCB utilized data derived from our 2017 Comprehensive Statewide Needs Assessment (CSNA) and preliminary feedback gathered from the 2020 CSNA to identify goals and priorities for the 2020 Oregon Combined State Plan submission. OCB clients and stakeholders provided feedback via email surveys, call in and in-person focus groups. The purpose was to solicit discussion, engagement and feedback on OCB's services strategies and service gaps.

Areas for improvement from the completed 2017 CSNA, and the preliminary 2020 CSNA yield consistent themes that are addressed by the aforementioned goals and strategies. Core themes identified consistently in both the 2017 and preliminary 2020 CSNA include:

Rural outreach

**Serving Minorities** 

Outreach and Education

Emerging themes from the 2020 CSNA are:

Employer attitudes and understanding of vision loss

Non VR Client Needs

Information about OCB Processes

The Goals and sub goals outlined in question L. (2) provide mechanisms to address, enhance and improve these themes and areas for improvement for OCB.

Analysis of customer satisfaction surveys and performance data show that OCB provides high quality services and positive outcomes for our clients. OCB places emphasis on careers that provide living wages and benefits, within a competitive and integrated context. The agency is committed to building on this excellence in quality services and outcomes. Overall, OCB has been able to provide the full range of VR services to all eligible individuals, including those experiencing the most significant disabilities, as OCB has not been required to be in an order of selection to date.

Analysis also yields areas for improvement of services. OCB's 2020 State Plan Goals and Priorities have been modified to reflect approaches to addressing consistent gaps or deficits in service areas revealed in the 2017 CSNA and in the preliminary findings of the 2020 CSNA.

### B. The State's performance under the performance accountability measures of section 116 of WIOA; and

Section 116 of WIOA references the following performance accountability measures:

the percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program; (II) the percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program; (III) the median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program; (IV) 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; (V) 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. (VI) Employer Engagement: rate of employer penetration and rate of repeat engagement. This last indicator is still in development at the state level, though OCB is tracking these activities internally.

The OCB will employ the following strategies and approaches to realizing the State's performance accountability under section 116 of WIOA. These strategies align with WIOA priorities and connect with performance accountability indicators. The OCB will continue to work with State WIOA core partners to support tracking and management of these performance indicators. OCB has created a data tracking dashboard to monitor performance accountability indicators, and uses the data to inform programmatic activities and improve OCB's dual customer outcomes.

The OCB will leverage its existing success towards contributing to the State's strategy of High skills/High wages, and will create new pathways to greater self-sufficiency for OCB participants through deeper collaboration among core and partner programs. The OCB will continue to provide comprehensive, participant-centered, individualized vocational and blindness rehabilitation services.

The OCB will continue to provide highly professional and informed counseling and guidance services to assist participants through issues of adjustment to disability, vocational and skill gap assessment/training, career matching, and integration into the workplace. The OCB will continue to make use of client-centered tools, such as Motivational Interviewing, to assist participants to identify the pathways of change that fit best for each individual.

The OCB will continue to provide services that assist individuals experiencing vision loss to retain employment, and continue to assist individuals who require supports to expand their work circumstances through promotional opportunities.

The OCB will continue to provide the highest quality blindness rehabilitation skills assessment and training, which are essential to creating an equal footing among non-disabled peers and within the community and workplace. Competitive, integrated employment is OCB's goal for all VR participants who are ready, willing and able to work.

The OCB will continue to provide cutting- edge adaptive skills assessment, tools and training that are critical to developing the technical access, efficiencies and competencies that meet business workforce needs.

The OCB will continue to provide vocational and academic training and paid work experience opportunities that bring the participant the technical and professional skills needed by business, broaden the participant perspective on workplace culture and expectations, and help workplaces

recognize the talents of persons who experience blindness through active demonstration of their value to businesses.

The OCB will continue to partner among agency staff, participants, and employers to provide on-site workplace evaluations for accessibility recommendations and tools.

The OCB will continue to refine its message and outreach methods to inform potentially eligible participants, businesses and partners about our comprehensive services.

The OCB will continue to refine facilitation of services for historically underserved communities such as non-native English speaking communities, co-occurring disabilities such as mental & behavioral health, and students.

C. Other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

The Oregon Commission for the Blind does not operate under the direction of the State Rehabilitation Counsel, but operates as a board-driven agency/commission. OCB has a history of outperforming the national average in terms of the number of individuals with vision loss with successful employment outcomes. OCB uses collected operational and anecdotal data to inform process and outcome improvement. OCB has not received findings or recommendations from monitoring activities conducted under section 107.

#### m. Order of Selection

Describe:

### 1. Whether the designated State unit will implement and order of selection. If so, describe:

### A. The order to be followed in selecting eligible individuals to be provided VR services

N/A.

OCB is not in an order of selection:

The purpose of an order of selection for services is to establish an equitable and organized system which, when resources are not sufficient to meet the demand for services, gives priority to those eligible vocational rehabilitation participants who require immediate services to maintain employment or who meet the definition of most significantly disabled. OCB considers legal blindness a significant disability. OCB was not in order of selection in FFY 16, FFY 17, FFY 18 and FFY19 and does not expect to be in an Order of Selection for FFY 20 or FFY 21.

#### B. The justification for the order

N/A

#### C. The service and outcome goals

When the order of selection for services is in effect, eligible individuals will be assigned to one of four priority categories: 1. First priority: New eligible participants who meet the definition of significantly disabled and have an immediate need for equipment or services to maintain employment; 2. Second priority: Follow- along services to those individuals who meet the definition of significantly disabled,

and are recent post-secondary graduates who were being served through pre- employment transition service dollars, in order to not interrupt service provision; 3. Third priority: New eligible participants who meet the definition of most significantly disabled but who do not have an immediate need for equipment or services to maintain employment; 4. Fourth Priority: New eligible participants who do not meet the definition of most significantly disabled, and do not have an immediate need for equipment or services to maintain current employment. The Executive director shall decide when to implement an order of selection for services, if necessary, and will determine which priority categories will be open or closed for the development of new individualized plans for employment. In the event sufficient funds or other resources become available to serve all eligible individuals, the executive director will revoke the order of priority.

### D. Time within which these goals may be achieved for individuals in each priority category within the order; and

Eligible individuals can develop and carry out an individualized plans for employment based on: a) The priority of the category to which they are assigned; b) Whether or not that category is open for development of new plans; and c) The order in which they applied for vocational rehabilitation services as indicated by the date of application. Participants will be placed in the highest priority category for which they are qualified. The date of application will be used whenever it is determined that a waiting list is required for a category. Participants will be notified in writing of their category status when they are notified of their eligibility, as well as of the conditions pertaining to that category, as to: whether the category is open or closed, and their position on any existing waiting list.

The only services to individuals in a closed order of selection for services category will be information and referral services. These individuals will not receive counseling and guidance, assessment and training, placement, or other vocational rehabilitation services until their category is reopened and they come off the waiting list.

Participants will be notified of the right to appeal the category decision and of their responsibility to notify the department if their situation changes in a way that may affect their priority category placement.

Individuals who are receiving services under an individualized plan for employment at the time an order of selection for services is implemented will continue to receive services as planned. They are not subject to the order of selection for services and are not a category within that order.

The order of selection for services will not affect the provision of services needed to determine eligibility for vocational rehabilitation services.

### E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities

An individual with a non-significant disability is an individual who: a) Has no more than one functional limitation related to employment; and b) Requires no more than one substantial type of services.

An individual with a significant disability is an individual who: a) Has at least two functional limitations related to employment; and b) Requires one or more substantial types of services provided over an extended period of time.

An individual with a most significant disability is an individual who:(a) Has at least three functional limitations related to employment and b) Requires two or more substantial types of services provided over an extended period of time.

### 2. If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection,

### who require specific services or equipment to maintain employment

OCB prioritizes individuals who require specific services or equipment in order to maintain employment.

#### n. Goals and Plans for Distribution of title VI Funds

#### 1. Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services

All of our Vocational Rehabilitation staff are educated in the provision of supported employment services and understand the issues related to eligibility, vocational assessment, and creating vocational plans that address the need for on-going long-term support services.

OCB has identified and is in process of securing additional qualified providers in local areas across the state to provide specialized Supported Employment services (assessment, skill building, job development, and job coaching and retention services). Much of the Title VI Part B funding is utilized for performance-based job development & coaching services provided by CRPs to support individuals who require long-term supports in able to work in integrated and competitive settings. OCB provides training and technical assistance related to issues of blindness to all providers who express an interest in working with individuals who have the potential to achieve an employment outcome through Supported Employment.

The Oregon Commission for the Blind uses its Title VI, Part B funds to provide supported employment services to eligible individuals with the most significant disabilities for whom competitive employment in an integrated setting is their current vocational goal. These clients, because of the nature of their disability, often require extensive services in order to be successful. Specialized placement assistance, lengthened training periods and planning for ongoing support is required in order for clients to be successful. All of the funds are used for individual case costs. Our approach for supported employment services is as follows: If an individual's goal is to pursue an employment outcome in an integrated setting, an IPE will be developed in accordance with the individual's strengths, interests, resources, priorities, and informed choice. Services are purchased on a fee-for service basis from providers within the community. Careful job analysis and intensive one to one training are provided.

The following is the Oregon Commission for the Blind's plan for distribution of our supported employment resources. The program utilizes the Title VI, Part B funds for case service funds for individuals with the most significant disabilities who require additional supports and long term support planning by a comprehensive rehabilitation team.

1. The target population is divided into three segments: 2. Individuals who are deaf- blind 3. Individuals with developmental disabilities in addition to blindness 4. Individuals with other significant disabilities such as traumatic brain injury in addition to blindness

The full scope of services authorized for supported employment is provided to clients. Each client is evaluated individually to determine his or her eligibility and potential to engage in supported employment. Eligibility determinations are funded through the 110 Program.

Supplemental assessments to determine potential for supported employment will be authorized with Title VI B funds. The supplemental assessment may be provided when a reassessment of the suitability of the placement is warranted, or when there is a change in the individual's medical condition.

If the assessment shows that the individual will require ongoing support to sustain acceptable work performance and maintain employment, supported employment is included in the services to be provided in the IPE. The IPE includes collaboration and funding from other agencies or organizations that assist by providing the ongoing support services required. All services provided by the Commission for the Blind are time limited, up to four years.

The following services may be provided by the agency for up to, but not exceeding, four years:

1. Supplemental assessments. 2. Job development and placement. 3. Supported employment services needed to support individuals with the most significant Disabilities such as: a) Intensive on the job skills training and other training to achieve and maintain job stability b) Follow up services to reinforce and stabilize the job placement c) Discrete post-employment services following transition that are unavailable from an extended services provider and that are necessary to maintain the job placement d) Specialized technology devices and training

Training and post-employment services that will lead to supported employment are provided by this agency. The necessary extended support is provided by other agencies. Services we provide include: the provision of skilled job coaches who accompany the worker for intensive on the job training, systematic training, job development, follow up services, regular observation or supervision of the individual at the training site, rehabilitation technology, and other services needed to support the client in employment.

Ongoing supports may be provided by the agency from the time of job placement until the transition to ongoing support (up to but not exceeding four years). These are services that are needed to support and maintain the individuals with the most significant disabilities in supported employment. Ongoing support services may consist of:

1. Specialized assessments 2. Skilled job trainers at the work site 3. Job development and placement 4. Social skills training 5. Regular observation or supervision of the individual 6. Follow up services such as regular contact with the employer, the individual, etc., to reinforce and stabilize the job placement 7. Facilitation of natural supports at the work site

Once the individual is transitioned from agency vocational rehabilitation support, another agency or resource provides the ongoing support services.

For clients with developmental disabilities, vocational rehabilitation counselors may coordinate with a program in Oregon that serves individuals with developmental disabilities. If the client is eligible, this program is the most likely resource for ongoing support for individuals who are legally blind in addition to developmental disabilities. This system uses brokerages that identify and coordinate services for the client.

## 2. Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:

### A. The provision of extended services for a period not to exceed 4 years; and

Our goals for the program for PY 20 and PY 21 include: 1. Coordinate the Summer Work Experience Program for students who require ongoing supports in partnership with the Department of Education 2. Partner with the education team that will support students who are leaving secondary school programs to develop a transition plan for school to work 3. Continue to outreach to the deaf-blind community 4. Coordinate with community resources to maximize comparable benefits and improve services for our clients 5. Grow the number of individuals served in the program and focus on positive outcomes in integrated settings with supports. In addition: OCB will provide SE extended services after placement for up to 4 years for individuals not covered by alternative programs or funding.

## B. How the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

The Oregon Commission for the Blind will continue to leverage agreements with partners/regional programs throughout the state to meet the needs of students with the most significant disabilities. The OCB is committed to working alongside DHS/DD/ID providers to insure that each student is surrounded with a qualified team of professionals to assist him/her towards their IPE.

#### o. State's Strategies

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

### 1. The methods to be used to expand and improve services to individuals with disabilities

OCB has developed the following goals, sub-goals, and strategies as methods for accomplishing the agency priorities as identified through interaction with the agency's Board of Commissioners, WIOA core partners, staff, agency participants and community stakeholders.

These Goals and Strategies reflect themes identified in the 2017 Certified Statewide Needs Assessment (CSNA), and preliminary findings from the 2020 CSNA (See section K.). The goals and strategies align with the state's Workforce Talent Development Board's Imperatives and Objectives, OCB's own mission vision and values, and the intent of WIOA. Section (L) articulates specific alignment of OCB Goals and Strategies with the state of Oregon's Workforce Talent Development Board's Strategic Imperatives and Objectives, and OCB's internal vision, mission and values. The goals are applicable for PY20 and PY21.

Goal 1: Successfully implement the intent of the Workforce Innovation and Opportunity Act into agency work and processes

Sub Goal 1.1: Continue to emphasize the state's strategy of High Skills/High Wage focus for agency participants.

Strategy 1.1: Incorporate WSO regional economic data and trends into regional OCB Vocational Rehabilitation Counselor regularly scheduled meetings. Focus on high wage/high skill/high demand industries and occupations.

Strategy 1.1.2: Integrate Labor Market Information and career pathway planning tools and approaches into IPE discussions with any client pursuing in employment.

Strategy 1.1.3: Work closely with Local Workforce Development Boards to identify and create skill upgrading opportunities that are accessible by Oregonians experiencing vision loss.

Sub Goal 1.2: Ensure access for blind, low vision and deaf blind individuals to the array of services available through the state's workforce system.

Strategy 1.2.1: Continue to provide consistent, regularly scheduled training to workforce partner service level staff on providing services to individuals with disabilities.

Strategy 1.2.2: Work with core state workforce partners to provide feedback and subject matter expertise on creating accessible systems for Oregonians experiencing vision loss.

Sub Goal 1.3: Engage with state and local community businesses in a way that best work for business, and better prepare agency participants for success by ensuring they have the skills that business needs.

Strategy 1.3.1: Assist with and participate with the ongoing development and expansion of Worksource Oregon regional Coordinated Business Services Teams.

Strategy 1.3.2: Educate business partners about Progressive Employment tools and resources as a method of increasing understanding of hiring and supporting Oregonians experiencing vision loss.

Goal 2: Increase Agency outreach and effectiveness of services to individuals and communities that would benefit from vocational rehabilitation services

Sub Goal 2.1: Increase cultural competency of agency staff

Strategy 2.1.1: OCB will partner with culturally specific/competent service providers to identify training resources for OCB staff to improve services to historically underrepresented populations.

Strategy 2.1.2: OCB will continue to work with Tribal Vocational Rehabilitation programs to ensure access to effective joint case management and culturally appropriate services.

Sub Goal 2.2: Raise awareness of OCB resources and services, with a focus on rural areas of the state.

Strategy 2.2.1: OCB will enhance statewide outreach and education activities and delivery modalities to target underserved populations and rural areas of the state as identified in the CSNA.

Strategy 2.2.2: OCB will engage with workforce boards and workforce system partners in rural areas to leverage outreach and service delivery whenever possible.

Goal 3: Expand Pre-Employment Transition Services for potentially eligible and eligible youth who experience vision loss throughout Oregon.

Sub Goal 3.1: Increase collaboration with local workforce development organizations to promote greater access to apprenticeship, certificate, and similar non-collegiate career tracks to youth experiencing vision loss.

Strategy 3.1.1: Increase OCB presence within workforce development partners by promoting student participation in job development services, apprenticeship/career fairs, and training programs and facilitating access to these events/services

Sub Goal 3.2: Develop creative and collaborative partnerships to increase access to Pre-ETS services for students in rural or otherwise underserved communities.

Strategy 3.2.1: Identify region-specific needs with regard to Pre-ETS services through ongoing assessment and communication with educational partners and workforce development organizations

Strategy 3.2.2: Partner with local organizations serving rural and underserved communities to promote OCB client access to pre-employment activities and to build long-term collaborations across Oregon

Sub Goal 3.3: Increase identification of potentially eligible students as early as possible in order to maximize impact of Pre-ETS services, especially as it relates to college and workplace readiness.

Strategy 3.3.1: Promote awareness of OCB services to schools and regional programs, emphasizing Potentially Eligible/Pre-ETS services available to students not yet ready to seek employment

Strategy 3.3.2: Increase awareness of Progressive Employment approach to vocational services and how PE activities can be utilized to prepare a student for their post-secondary goals

Sub Goal 3.4: Maintain consistent communication with secondary and post-secondary education providers to ensure OCB services address current and anticipated technology and skill competencies necessary for post-secondary success in a rapidly changing social and technological environment.

Strategy 3.4.1: Continue College Readiness Collaborative meetings and regularly assess OCCB college readiness checklist to ensure competencies are congruent with the skills currently needed for post-secondary education and employment.

Goal 4: Increase the capacity of Oregon's businesses to hire and retain Oregonians experiencing vision loss.

This is a new goal, representing enhanced activities with Oregon businesses to drive improved employment and career outcomes for Oregonians experiencing vision loss.

Sub Goal 4.1: Expand and enhance Community Rehabilitation Provider/contracted Job Developer onboarding and training.

Strategy 4.1.1: Continue and enhance Community Rehabilitation Provider/Contracted Job Developer onboarding and contextualized training activities

Sub Goal 4.2: Expand business understanding of VR employment strategies such as Progressive Employment, CRP's and Job Carving strategies and approaches.

Strategy 4.2.2: Develop and implement businesses facing training tools for improving understanding of VR tools and approaches such as Progressive Employment, the role of Community Rehabilitation Providers and Job Carving/Job Customization techniques.

## 2. How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis

The Workforce Innovation and Opportunity Act prioritizes accessibility for workforce partners, and the OCB will continue to advocate universal accessibility among the core and allied partner programs, with a focus on shared workforce customers who are blind, low vision or deaf blind. OCB's Assistive Technology and Business Relations staff form an integrated services team and will continue to educate and train businesses and WIOA core partner staff around the role of technology in serving clients experiencing vision loss and in preparing clients for the workplace.

Each OCB Field office is staffed by an Assistive Technology Specialist that provides targeted foundational skills technology training and focused job –specific training as determined by client need and informed by the clients VRC and plan goals. The AT staff work with regional OCB Business Relations Coordinators to deliver Assistive Technology demonstrations and education, as well as customized support around individual client needs and specific business systems at worksites. This model delivers OCB client services statewide.

OCB will continue to provide high quality blindness skills training to agency participants to best prepare them for employment and success in life. OCB participants learn the fundamentals using assistive and adaptive technologies, as well as how to troubleshoot access issues as they arise in life and in the workplace, and are able to effectively self-advocate for their needs. OCB clients are informed of vendors and assistive technology vendors, resources and service providers. Instruction is contextualized whenever possible, such as how to access and participate with Oregon's TDAP program. Instruction is increasingly individualized, based on client need and employment goal. AT staff engage in staffing with BRC and VRC staff to ensure discussions about technology learning are incorporated into all aspects of a client's rehabilitation experience.

Externally, OCB will advocate full programmatic and information accessibility for individuals who are blind, low vision and deaf blind among all core WIOA, business and community partners. The OCB will consistently offer information as to the benefits of making access an organizational priority, and

provide supports to get partner organizations and businesses on the path towards accessible systems. OCB will continue to expect access for its agency participants to the full array of services available through the workforce system.

#### 3. The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program

Based on feedback from the 2017 CSNA and preliminary feedback from the 2020 CSNA, stakeholders consider outreach and education, specifically rural outreach, as an area for improvement for OCB. Outreach and education is prioritized by OCB internally through OCB's Key Goal of Effective Community Education and Outreach.

OCB maintains an agency website with information on resources, services and how to become a client. Contact information for all OCB statewide field offices is maintained on the website, and interested potential clients and businesses partners can email questions or requests directly through the website. OCB staff respond promptly to all communications. OCB updates this website on a quarterly basis (at a minimum) to ensure information is up to date, and seek out opportunities for improvements and efficiencies. OCB uses a video produced through technical assistance from the Institute for Community Inclusion and University of Massachusetts Boston though JDVRTAC. This video is used in outreach presentations and is available on OCB's website. The video link is often sent to potential or scheduled outreach audiences.

In PY 2019, OCB launched a Business Relations e-newsletter using Constant Contact. This outreach tool is targeted towards OCB potential and existing business partners, and the content is tailored for the geographic region targeted. Content includes information about accessing services for clients and businesses, successes, needs and events. OCB will continue using this outreach tool into PY20 and PY 21, with regularly scheduled updates and revision processes.

OCB's Workforce Services Team conducts approximately 40-50 partnering, outreach and education events each quarter. These events and activities take the form of presentations on processes, services and resources available to Oregonians experiencing vision loss and businesses/organizations interested in hiring persons who experience vision loss; demonstrations on assistive and adaptive technology; and trainings on disability etiquette and issues related to vision loss. These outreach and presentation activities are provided to any interested stakeholder, and are targeted toward: regional and statewide workforce system partners, businesses, community stakeholder groups and medical providers. Follow up communication is sent after each activity. OCB will develop systems for consistently collecting and utilizing feedback data for process and quality improvement.

OCB staff participate on boards, leadership groups and other venues that provide a platform for talking about OCB services and resources for clients and business partners.

OCB will leverage WIOA core partner resources whenever possible, including accessing WIOA core partner resources appropriate for serving underrepresented populations. OCB will engage in outreach and education with culturally specific organizations in each regional service delivery area to share information about OCB services and resources, better leverage expertise and provide higher quality services for potential OCB clients, especially those underrepresented and /or underserved by OCB. As part of this focus, OCB is part of an 'E3' Targeted Communities Technical Assistance Grant focused on building capacity in serving underserved and underrepresented individuals in rural high poverty areas.

### 4. The methods to be used to improve and expand VR services for students with disabilities, including the coordination of

#### services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and preemployment transition services)

OCB has developed the following Goals, Sub Goals and Strategies to improve and expand VR services for students with disabilities. These goals were outlined in sections (L) and in section (O)(1) outlined above:

Goal 3: Expand Pre-Employment Transition Services for potentially eligible and eligible youth who experience vision loss throughout Oregon.

Sub Goal 3.1: Increase collaboration with local workforce development organizations to promote greater access to apprenticeship, certificate, and similar non-collegiate career tracks to youth experiencing vision loss.

Strategy 3.1.1: Increase OCB presence within workforce development organizations by promoting student participation in job development services, apprenticeship/career fairs, and training programs and facilitating access to these events/services

Sub Goal 3.2: Develop creative and collaborative partnerships to increase access to Pre-ETS services for students in rural or otherwise underserved communities.

Strategy 3.2.1: Identify region-specific needs with regard to Pre-ETS services through ongoing assessment and communication with educational partners and workforce development organizations

Strategy 3.2.2: Partner with local organizations serving rural and underserved communities to promote OCB client access to pre-employment activities and to build long-term collaborations across Oregon

Sub Goal 3.3: Increase identification of potentially eligible students as early as possible in order to maximize impact of Pre-ETS services, especially as it relates to college and workplace readiness.

Strategy 3.3.1: Promote awareness of OCB services to schools and regional programs, emphasizing Potentially Eligible/Pre-ETS services available to students not yet ready to seek employment

Strategy 3.3.2: Increase awareness of Progressive Employment approach to vocational services and how PE activities can be utilized to prepare a student for their post-secondary goals

Sub Goal 3.4: Maintain consistent communication with secondary and post-secondary education providers to ensure OCB services address current and anticipated technology and skill competencies necessary for post-secondary success in a rapidly changing social and technological environment.

Strategy 3.4.1: Continue College Readiness Collaborative meetings and regularly assess OCCB college readiness checklist to ensure competencies are congruent with the skills currently needed for post-secondary education and employment.

The OCB will continue to provide its array of services/programs and paid work experiences to students with vision loss/blindness. OCB will continue to organize and manage our two paid summer work experience programs (in Salem and Portland) for eligible students age 16+, and will expand the program and staffing to provide more paid work experience and pre- employment transition service opportunities throughout the year. OCB will investigate options for a third track summer youth program to better serve transition youth in rural Oregon.

### 5. If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State

OCB is committed to continuing to grow and educate our Community Rehabilitation Providers throughout Oregon in order to enhance opportunities for persons who experience vision loss to gain and retain independence and employment. During the first State Plan period OCB created an implemented an intensive onboarding process for community rehabilitation program and related service providers that covers OCB processes, services, context and issues and resources available to OCB clients. OCB will continue to refine and improve this CRP onboarding and training process through the next state plan period. CRP's are invited to attend weekly Jobsville Progressive Employment regional staffing meetings to discuss challenges, successes, labor market information and other factors that contribute to client and business relations successful outcomes.

OCB will work with WIOA core partners and Community Rehabilitation Providers to create enhanced understanding of how CRP's fit within the service delivery model of the broader public workforce system, and how the strengths and resources of both entities can be leveraged for maximum OCB client success. OCB will continue to partner with the state's general Vocational Rehabilitation agency to create common understanding of the role and functions of Community Rehabilitation Providers (CRPs) and to conduct joint activities with other WIOA partners and stakeholders.

## 6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA

It is the position of OCB that the Goals, Priorities, and Strategies articulated in Oregon's 2020 Combined State Plan will lead to improvements on performance accountability with regard to measures under section 116 of WIOA.

OCB will continue to pursue goals and strategies to improve the performance of the State with respect to performance accountability measures under section 116 of WIOA. Those measures under section 116 of WIOA are: (I) the percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program; (II) the percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program; (III) the median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program participants who are in unsubsidized employment during the second quarter after exit from the program; (IV) 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; (V) 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. The State is also developing an employer engagement/satisfaction performance measure.

OCB will continue to employ strategies in PY 20, PY 21 and beyond, working with the State WIOA core partners to gather and report performance, analyzing and adjusting strategies as needed to address any new impediments to achieving negotiated performance accountability targets.

The following is a representation of The Oregon Commission for the Blind's performance in the WIOA Performance Indicator areas by PY:

2 <sup>nd</sup> Quarter Employed	PY2017: 62.38%, PY2018: 51.98%
4 <sup>th</sup> Quarter Employed	PY2017: 25.74%, PY2018: 19.21%
Credential Attainment:	PY2017: 14.1%, PY2018: 17%
Measurable Skills Gain	PY2017: 53.33%, PY2018: 46.20%
Median Earnings 2 <sup>nd</sup> QTR after Exit	PY2017: \$4328.37, PY2018: \$3213.36

The following are projections of trends in these WIOA performance evaluation areas. These numbers don't represent targets, but a gradual and conservative forecast of the direction OCB's specific

performance is moving. These projections are not a required part of the program specific portion of Oregon's Combined State Plan. The only mandated target is for this period is for the combined state Measureable Skills Gain target, reflected in the common elements portion of Oregon's Combined State Plan.

2 <sup>nd</sup> Quarter Employed	PY2019: 53%, PY2020: 54%, PY2021: 55%
4 <sup>th</sup> Quarter Employed	PY2019: 21.5%, PY: 22.5%, PY2021: 23.5%
Credential Attainment:	PY2019: 18%. PY2020: 19%, PY2021: 20%
Measurable Skills Gain:	PY2019: 48.20%, PY2020: 50.20%, PY2021: 52.20%

## 7. Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities

Creating capacity and competence in serving individuals with disabilities in the public workforce system are key OCB program goals and strategies for improving positive outcomes for Oregonians experiencing vision loss. These strategies are important, and are explicitly called in out in OCB's Goals and Strategies. OCB actively engages with the State's Workforce Executive Team (WSET), the Oregon Workforce Partnership (OWP, an organization of the state's workforce boards) and strategic and local leadership teams as appropriate. Through engagement in these venues with these partners, OCB will make an impact on partner service creation and delivery to Oregonians experiencing vision loss.

To assist other components of the statewide workforce system, OCB will:

Continue to provide consistent, regularly scheduled training to workforce partner service level staff on providing services to individuals with disabilities. Expand and schedule annual (or as appropriate) disability awareness, disability etiquette and assistive and adaptive technology demonstrations to Oregon Employment Department Universal Access Coordinators to maintain that group's skills sets for working with people with disabilities in the public workforce system. Training activities will work toward enhancing understanding of the context, issues and resources available to jobseekers experiencing vision loss. OCB will work with core state workforce partners to provide feedback and subject matter expertise on creating accessible systems for Oregonians experiencing vision loss. OCB will continue providing ongoing feedback to the state's labor exchange system, iMatchSkills, to inform improvements in accessibility as the state undergoes modernization processes for this system.

OCB will continue to provide training and education to the state's general VR agency around services and resources for Oregonians experiencing vision loss. OCB will continue to partner with Oregon's general Vocational Rehabilitation agency around business engagement, and around accessibility with WSO.

OCB will continue to work and partner with local board staff and other WIOA core partners to identify strategies towards Universal Access that broadly improves services for all Oregonians with disabilities, especially with regard to training and skill upgrade services.

#### 8. How the agency's strategies will be used to:

### A. Achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

The goals, priorities, and strategies detailed in the OCB's program portion of Oregon's Combined State Plan were developed to directly address themes identified in the 2017 Comprehensive Statewide Needs Assessment, incorporate preliminary feedback from the 2020 CSNA, and align with

the state of Oregon's Workforce Talent Development Board's Strategic Plan imperatives. OCB will hold quarterly process evaluation meetings to track and adjust progress as necessary. The goals, sub goals and strategies OCB will use to achieve the goals and priorities by the state are outlined in sections (L) and (O) (1) of this Program Specific portion of Oregon's WIOA Combined State Plan.

#### B. Support innovation and expansion activities; and

OCB highly values innovation and appropriate expansion of evidence based approaches for client services. OCB will work to achieve the goals and priorities of the state, and remain consistent with the most recent Comprehensive Statewide Needs Assessment by following the strategies articulated in section (O) as the agency works towards innovation and expansion of resources, tools and approaches to serving businesses and Oregonians with vision loss. Several Goals and Strategies developed in sections (L) and (O) (1) reflect new and innovative approaches, and the continuation and/or expansion of successful activities and initiatives.

OCB will discover, generate and improve upon service delivery processes and activities for the agency's dual customer base of our businesses partners and individual clients. Integration with WIOA partners will afford OCB increased opportunities for new and improved ways of serving clients and business partners.

OCB will seek out opportunities to creatively partner with Oregon's public workforce system around opportunities for transition students with disabilities.

OCB will seek to align new services and approaches with core WIOA partners such as the state's general Vocational Rehabilitation agency and the Oregon Employment Department, expanding creative engagement with other WIOA core partners as the opportunities emerge.

## C. Overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.

The Workforce Innovation and Opportunity Act prioritizes accessibility for workforce partners, and the OCB will advocate universal accessibility among the core and allied partner programs, with a focus on shared workforce customers who are blind, low vision or deaf blind.

Creating capacity and competence in serving individuals with disabilities in the public workforce system are key OCB program goals and strategies for improving positive outcomes for Oregonians experiencing vision loss. These strategies are important, and are explicitly called in out in OCB's program specific goals and strategies as part of the state plan submission. The state's Workforce Executive Team (WSET), the Oregon Workforce Partnership (OWP an organization of the state's workforce boards) and strategic and local leadership teams as appropriate to discuss equitable access to the state's public workforce system. OCB will continue to partner and enhance opportunities to address barriers to access with Oregon's general Vocational Rehabilitation agency through shared access with state, non-profit and business partners. Through engagement in these venues with these partners, OCB will make an impact on partner service creation and delivery to Oregonians experiencing vision loss.

### p. Evaluation and Reports of Progress: VR and Supported Employment Goals

Describe:

1. An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or

### Combined State Plan for the most recently completed program year were achieved. The evaluation must:

#### A. Identify the strategies that contributed to the achievement of the goals

The goals outlined in the approved VR portion of the prior Unified State Plan for the most recently completed program year, PY 18, were as follows:

Goal 1: Successfully implement the intent of the WIOA into agency work and processes

Sub Goal 1.1: Continue to emphasize the State's Strategy of High Skills/High Wages focus for agency participants

Progress: Goal 1 is a continuation goal from OCB's 2016 Oregon Unified State Plan submission, is unchanged, and will remain a priority goal for OCB to work toward moving forward in the 2020 Oregon Combined State Plan.

OCB Workforce Services staff use labor market information gathered disseminated by WSO partners for weekly updates provided to Vocational Rehabilitation Counselors and OCB Community Rehabilitation Providers (CRP's) about WSO hiring activity and events, industry sector trends and occupational growth areas. These weekly meetings rotate regionally throughout the state, and act as a staffing for both the individual client and business partner needs. AT staff work with counselors to introduce online Career Exploration Tools, such as The Career Index Plus (TCI+) as contextualized technology training that also prepares clients to use labor market information as part of their career plan. As part of OCB's implementation of the Progressive Employment model, OCB clients participate in experiential learning activities with employers – gaining increased understanding of demand industry sectors and career pathways within them. WIOA partner expertise has been tapped to provide training at monthly statewide VR Counselor meetings, around the state's efforts with sector strategies as needed. Statewide and regional labor market information prepared by the Oregon Employment Department (OED) is distributed and discussed with OCB VRC and Workforce Team staff when available. OED staff are tapped to attend Vocational Rehabilitation Counselor meetings and present information about workforce services and other topics.

OCB staff are connected to WorkSource Oregon local leadership teams when capacity allows. OCB Vocational Rehabilitation Counselors and Business Relations Coordinators represent OCB interests at local leadership teams and participate in joint work groups whenever possible. This creates a conduit for information on services and resources available to OCB clients for skill development, industry credentials and career pathway resources. It also works to develop capacity of workforce system partners to successfully provide services for OCB clients.

OCB will retain this goal moving in to the next Combined State plan period, and continue to build on WIOA implementation and integration efforts.

Sub Goal 1.2: Ensure equal access for blind, low vision and deaf blind individuals to be able to benefit from the array of services available through the state's workforce system

Progress: OCB provided disability awareness and assistive technology demonstration training to the state workforce system's Access Navigators in PY18. Access Navigators are Worksource Oregon (WSO) staff identified to assist with universal customer access. OCB staff provided the same training to WSO front line staff in multiple comprehensive WSO centers throughout the state. OCB has actively reached out to the state agencies responsible for Oregon's labor exchange, iMatchskills, to provide advice and feedback on accessibility challenges for screen reader users. OCB VRC staff have begun participating in LWDB local leadership teams to gain a better understanding of workforce systems processes and services, and how they can be made more accessible. OCB Workforce Team staff have provided feedback on accessibility challenges with the state's labor exchange system, iMatchSkills, and continue to actively engage with efforts toward creating a more accessible system.

Sub Goal 1.3: Engage with state and local community businesses in ways that best work for business, and better prepare agency participants for success by ensuring they have the skills that meet business needs.

Progress: OCB initiated multiple strategies to implement the intent of WIOA into agency work and processes, including the creation of a new interdisciplinary team to focus efforts on business engagement. OCB hired a Workforce Innovation Manager, and created an interdisciplinary Workforce Services Team composed of five statewide Assistive Technology Specialists (AT) and three statewide Business Relations Coordinators (BRCs). One of the BRC staff is dedicated to serving transition students and youth exclusively.

A significant intent of WIOA is in the elevation of business to a "dual customer" status. The Workforce Services Team acts as a bridge for the business community and the public workforce system with OCB's staff and clients. BRC staff are part of regional Worksource Oregon (WSO) Collaborated Business Services Teams. These teams are composed of WSO partners and create a 'single point of contact' to simplify and streamline business interaction with Oregon Businesses. Partners educate each other about each organization's goals and resources, and that information is shared with the potential business partner through a singular contact to create a simple way businesses can partner with the public workforce system. These 'Collaborated Business Teams' started in the Portland metro area, and OCB BRC staff are instrumental in rolling this model out to other areas in the state.

OCB BRC staff are in consistent communication with business facing staff from the state's general VR agency to align business engagement activities. BRC staff have engaged with national business outreach through the National employment Team (NET), and consistently participate as OCB's single point of contact for this group. NET aligns VR agencies with multi-state, national employers. OCB is working in partnership with NET around establishing 'Model State Employer' designations and partnerships as a result of NET activities.

Ongoing outreach and training by OCB's Workforce Team included training on: disability etiquette, assistive and adaptive technology solutions, and Federal and State financial incentives, such as the Work Opportunity Tax Credit

Progressive Employment activities, such as informational interviews, work experiences, on the job training all work toward preparing and reinforcing the jobseeker for the skills needed by our business partners.

OCB created an in-house business engagement tracking tool. This tool records business contacts and tracks interactions on a statewide basis. This tracking tool is used to customize interactions with businesses to make the best use of business partner time and resources, and create the highest quality outcome for the business partner and OCB's client. This data will be shared with state WIOA partners when that capacity is developed. OCB will continue investigating alternate business relationship tracking software moving forward, as agency and partnership needs evolve.

Sub Goal 1.4: Implement creative and meaningful changes to agency processes and services in order to best meet intent of WIOA around services to youth.

Progress: OCB created an interdisciplinary team of Business Relations Coordinators (BRC) and Assistive Technology Specialists (AT) that form OCB's Workforce Services Team. In 2019, OCB hired a statewide BRC assigned specifically to Transition students/youth. This position is dedicated toward building business relationships and opportunities for OCB's Transition Youth/Student constituency. The Transition Student/Youth BRC also works to create activities and build partnerships with other service providers to leverage resources in the most effective way. This Transition Student/Youth BRC works in close coordination with business outreach and engagement efforts of OCB's VR serving BRC staff as well Business Relations staff from Oregon's general Vocational Rehabilitation agency. Staff share business contact information, and strategies for successful partnering.

OCB has identified and begun work on several new strategies to improve services to youth:

Increased identification of potentially eligible students as early as possible in order to maximize impact of Pre-ETS services, especially as it relates to college and workplace readiness

Increased collaboration with local workforce development organizations to promote greater access to apprenticeship, certificate, and similar non-collegiate career tracks to youth experiencing vision loss

Maintained consistent communication with secondary and post-secondary education providers to ensure OCB services address current and anticipated technology and skill competencies necessary for post-secondary success in a rapidly changing social and technological environment

Developed creative and collaborative partnerships to increase access to Pre-ETS services for students in rural or otherwise underserved communities

OCB started these efforts in PY18, and plans to continue to refine and build them moving forward. OCB staff are conducting enhanced outreach to regional Education Service Districts throughout the state to educate them about the issues, contexts and resources available to transition/youth with the goal of expanding services to those potentially eligible. OCB Vocational Rehabilitation Counselors serving youth are developing relationships with appropriate staff at ESD's OCB has agreements with to begin working on student's Individualized Education Plans at an earlier stage.

Goal 2: Increase Agency outreach and effectiveness of services to individuals and communities that would benefit from vocational rehabilitation services

Progress: OCB launched and maintained an aggressive outreach and education strategy with business, business facing organizations, public work force partners, medical providers and other potential and existing stakeholders at a statewide level. Outreach and education is a key process measure in OCB's internal performance management system and is tracked, measured and reviewed quarterly. In PY 18, OCB completed 295 outreach, partnering and education activities. In PY 19, OCB conducted 224 outreach, partnering and education activities by the end of Q2.

Sub Goal 2.1: Increase effectiveness and cultural literacy of staff

Progress: OCB provided training to VRC staff in PY 19 on Disability Justice. As an ongoing practice, OCB seeks out and provides agency process training to culturally competent vendors, and connects them to clients as appropriate when additional cultural support is needed. In PY 18, OCB engaged with Project E3 (Educate. Empower and Employ), an effort to connect resources and services to underrepresented youth in Oregon's rural geographic areas. Individually, VRC staff seek out opportunities to increase their cultural effectiveness and literacy when it would help with client service provision.

Goal 3: Enhance and Maintain OCB Capacity & Expertise in Serving Oregonians who are blind/visually impaired

Progress: Through the Progressive Employment model referenced earlier, OCB has continued to incorporate tools and techniques for developing employer desired soft skills into client activities and experiences. VR Counselors, Orientation and Mobility Instructors, Rehabilitation Instructors and Assistive Technology Specialists all provide opportunities for OCB clients to practice decision making, critical thinking and other soft skills as an integrated part of each of their client interactions.

Business Relations staff at OCB engage with businesses, business facing organizations, and allied VR service organizations to learn what soft skills are desired by employers, and provide training to OCB staff, partners and contractors as appropriate. Staff are apprised of these soft skills needs through structured training activities, such as Counselor Training Week offered twice a year.

OCB Business Relations staff will continue to engage with core WIOA partners and other workforce service providers, through statewide and local area meetings to learn new tools, resources and best practices to embed in OCB approached to career development and employment.

Sub Goal 3.1: Enhance awareness among all staff of context, issues, and skills of blindness

Progress: OCB has a robust new employee onboarding process that integrates experiential learning into a new employee's understanding of issues and supports related to vision loss. All staff are encouraged to participate in opportunities to learn from speakers and assistive technology vendors as they are scheduled. Every other year, OCB all OCB statewide staff attend an All Staff training week. Regardless of team or assignment, all OCB staff are encouraged to attend training and learn from subject matter experts as they are able.

OCB BRC staff have developed and implemented a training process for Community Rehabilitation Providers (CRP's) to help them better understand the context, issues and skills of blindness. This training happens during CRP onboarding and is reinforced by regularly scheduled training opportunities. This approach has been effective in helping CRP's provide effective services to OCB clients.

Sub Goal 3.2: Improve systems for universal accessibility, both internally within the agency and externally among partners

Progress: In 2018 OCB's Workforce Services Team was accepted into a DOL ETA Innovation Cohort on accessibility in public workforce systems. OCB staff worked with WIOA VR staff from six different states to jointly identify an area within system accessibility, and then support each other in the creation of individual state level interventions. The cohort identified Universal Access as its primary topic, and created a draft plan for a statewide Universal Access workgroup.

OCB reached out to the Oregon Employment Department's Universal Access Coordinator to integrate issues and resources connected to vision loss into specific training for identified WSO (AJC) Universal Access staff – and then conducted that training in May of 2019. OCB has scheduled follow up annual trainings for these WSO partner staff. OCB's Workforce Innovation Manager and OED's Universal Access Coordinator maintain consistent communication. OCB has engaged with the Oregon Employment Departments and Oregon's Department of Human Services to provide feedback on technology modernization efforts, with a focus on digital accessibility for Oregonians experiencing vision loss. These efforts are ongoing.

Sub Goal 3.3: Refine and maintain systems for knowledge transfer and leadership development

Progress: OCB has improved the documentation of policy and processes for succession planning and related knowledge transfer. Whenever possible, we attempt to double fill positions to enhance dissemination of knowledge from incumbent to new hire. OCB has maintained a level of support for staff and managers to develop leadership skills by tapping into the state's internal learning systems and opportunities. All new managers are required to take a series of state trainings on management foundations.

Goal 4: Enhance the vocational aspects of vocational rehabilitation within agency processes

Progress: Business engagement and employment outcomes are part of agency core performance management processes that are owned, measured and evaluated by management staff and their teams. The focus on these measures helps maintain efforts aimed at core vocational processes and outcomes.

Business Relations staff at OCB engage with businesses, business facing organizations, and allied VR service organizations to learn what soft skills are desired by employers, and provide training to OCB staff, partners and contractors as appropriate. Staff are apprised of these soft skills needs through structured training activities, such as Counselor Training Week.

OCB Business Relations staff continue to engage with core WIOA partners and other workforce service providers, through statewide and local area meeting to learn new tools, resource and best practices to embed in OCB approached to career development and employment.

Sub Goal 4.1: Integrate employment into a unified customer experience at all phases of the vocational rehabilitation process

Progress: OCB has continued to integrate a vocational focus into all aspects of agency VR processes. VR Counselors have had the opportunity to learn core WIOA concepts such as the use of labor market information and intelligence, career exploration and a pathways approach to career growth through interaction with WSO SME staff. OCB's Business Relations Coordinators push information on business recruitment needs, labor market information or Progressive employment opportunities to VR Counseling staff on a rotating weekly basis, customized for each of the state's geographic regions.

As mentioned earlier, OCB Workforce Services staff use labor market information gathered disseminated by WSO partners for weekly updates provided to Vocational Rehabilitation Counselors and OCB Community Rehabilitation Providers (CRP's) about WSO hiring activity and events, industry sector trends and occupational growth areas. These weekly meetings rotate regionally throughout the state, and act as a staffing for both the individual client and business partner needs. AT staff work with counselors to introduce online Career Exploration Tools, such as The Career Index Plus (TCI+) as contextualized technology training that also prepares clients to use labor market information as part of their career plan. As part of OCB's implementation of the Progressive Employment model, OCB clients participate in experiential learning activities with employers – gaining increased understanding of demand industry sectors and career pathways within them. WIOA partner expertise has been tapped to provide training at monthly statewide VR Counselor meetings, around the state's efforts with sector strategies as needed. Statewide and regional labor market information prepared by the Oregon Employment Department is distributed and discussed with OCB VRC and Workforce Team staff when available.

OCB staff are connected to WorkSource Oregon local leadership teams when capacity allows. OCB Vocational Rehabilitation Counselors and Business Relations Coordinators represent OCB interests at local leadership teams and participate in joint work groups whenever possible. This creates a conduit for information on services and resources available to OCB clients for skill development, industry credentials and career pathway resources. It also works to develop capacity of workforce system partners to successfully provide services for OCB clients.

Sub Goal 4.2: Build employer-desired core soft skills (critical thinking, decision making, etc.) throughout skill development and training processes.

Progress: Through the Progressive Employment model referenced earlier, OCB has continued to incorporate tools and techniques for developing employer desired soft skills into client activities and experiences. VR Counselors, Orientation and Mobility Instructors, Rehabilitation Instructors all provide opportunities for OCB clients to practice decision making, critical thinking and other soft skills as integrated part of each of their client interactions. BRC's have created opportunities for employers, such as Kaiser Permanente NW and New Seasons, to participate in 'mock interviews' at regularly scheduled events. These 'mock interviews' are conducted by employees of OCB business partners, and give OCB clients real world feedback on soft skills used in interview situations.

### B. Describe the factors that impeded the achievement of the goals and priorities

The goals outlined in the approved VR portion of the prior Unified State Plan for the most recently completed program year, PY 18, were as follows:

Goal 1: Successfully implement the intent of the WIOA into agency work and processes

Sub Goal 1.1: Continue to emphasize the State's Strategy of High Skills/High Wages focus for agency participants

Impediments: Many training providers utilized by the state workforce system for occupational skills training or short term skill upgrades are not prepared for the accommodative needs of OCB clients, and training entry and exit points don't work well for individual client rehabilitative processes. Apprenticeships are another pathway to High Wage/High Skill employment. Traditional trades and apprenticeship programs do not have clear avenues for accessibility or viability for candidates experiencing vision loss.

Sub Goal 1.2: Ensure equal access for blind, low vision and deaf blind individuals to be able to benefit from the array of services available through the state's workforce system

Impediments: The state public workforce system presents numerous significant challenges to accessibility for OCB clients experiencing vision loss. The state's labor exchange system, iMatchSkills, is not accessible for screen reader users. Key elements of WSO services are highly challenging or inaccessible for many of OCB's clients. OCB VRC staff have low levels of confidence in the WSO successfully providing resources or services to OCB clients based on past experience.

Sub Goal 1.3: Engage with state and local community businesses in ways that best work for business, and better prepare agency participants for success by ensuring they have the skills that meet business needs.

Impediments: OCB's clients are highly individualized, with unique accommodation needs. There is not always a client 'ready and available' for a given employment opportunity with a business partner. Business internal technology systems can be complicated and are often proprietary, creating challenges to creating individualized accessible productivity solutions for each business and each client. Little formal training exists for Assistive Technology staff especially with regard to newer technology systems within potential business partners.

Sub Goal 1.4: Implement creative and meaningful changes to agency processes and services in order to best meet intent of WIOA around services to youth.

Impediments: Rural communities may have limited WIOA Youth services available. Transportation in rural communities may be challenging. Prior history of limited partnering with YTP programs may create challenges to building new relationships.

Goal 2: Increase Agency outreach and effectiveness of services to individuals and communities that would benefit from vocational rehabilitation services

Impediments: OCB lacks outreach capacity for consistent follow up with every outreach and education instance. Often, businesses do not understand that OCB may not have a client ready for work experience or employment placement. This has acted to diminish business interest in partnering with OCB if a client is not ready to work at the business.

Sub Goal 2.1: Increase effectiveness and cultural literacy of staff

Impediments: Other technical training related to direct service provision and/or administrative work associated with WIOA and RSA requirements compete for time VRC staff could dedicate toward cultural literacy/effectiveness training. It has been challenging prioritizing cultural effectiveness and literacy skill development over compliance and performance training.

Goal 3: Enhance and Maintain OCB Capacity & Expertise in Serving Oregonians who are blind/visually impaired

Impediments: None.

Sub Goal 3.1: Enhance awareness among all staff of context, issues, and skills of blindness

Impediments: OCB is composed of several stand alone and integrated teams. Day to day workload can create challenges for ensuring that all staff are as up to date as possible with an understanding of the context, issues and skills related to blindness.

Sub Goal 3.2: Improve systems for universal accessibility, both internally within the agency and externally among partners

Impediments: OCB does not have staff capacity to provide ongoing and consistent guidance around accessibility of public systems.

Sub Goal 3.3: Refine and maintain systems for knowledge transfer and leadership development

Impediments: OCB does not always have control of the context or other situational elements of staff turnover or change.

Goal 4: Enhance the vocational aspects of vocational rehabilitation within agency processes

Impediments: None.

Sub Goal 4.1: Integrate employment into a unified customer experience at all phases of the vocational rehabilitation process

Impediments: OCB clients have a highly individualized set of goals and needs, based on prior work experience, education, specifics of vision loss or co-occurring disabilities. As such, approaches to employment are highly individualized.

Sub Goal 4.2: Build employer-desired core soft skills (critical thinking, decision making, etc.) throughout skill development and training processes.

Impediments: None.

#### 2. An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:

#### A. Identify the strategies that contributed to the achievement of the goals

Goal 1: Coordinate the Summer Work Experience Program for students who require ongoing supports in partnership with the Department of Education.

Progress: In PY 16, PY 17, and PY 18, the agency continued to hold the Summer Work Experience Programs (SWEP) first at the Campus of the Oregon School for the Deaf and then at Willamette University in Salem, Oregon. The outcome reports following the program were incorporated into the planning for the individualized education plans of the students who returned to school in the Fall. The Salem program is fully integrated: serving both students who are able to live/work independently as well as those needing additional supports.

This allows OCB to utilize the more extensive staff and larger facilities available in Salem in order to provide all students entering the Summer Work Experience Program (SWEP) with a more comprehensive assessment and training experience. This further allows us the ability to provide regional programs with information they need to inform the education and training needed for these students during the academic year.

Students are assessed and if they need additional skill development they attend the Salem SWEP. Students who are assessed and determined to have appropriate skillsets for more complex environments/large city navigation attend the Portland SWEP at Portland State University.

OCB began development of an additional 'third track' SWEP program to address access issues for appropriate clients in rural areas of the state who have challenges accessing services in Oregon's urban areas and for those students for which a residential program was not a good fit.

Impediments: None.

Goal 2: Partner with the education team that will support Supported Employment students who are leaving secondary school programs to develop a transition plan for school to work

Progress: Whenever possible, the agency attended individualized transition plan meetings for all Supported Employment students exiting the schools in order to provide seamless services to students exiting the school system. OCB continued this practice in PY 16, PY 17 and PY 18.

Impediments: None.

Goal 3: Continue to outreach to the deaf-blind community (including those needing Supported Employment services)

Progress: The agency is involved in a community coalition of stakeholders who are committed to serving individuals who are deaf blind and needing Supported Employment and other mitigating supports. The agency's deaf-blind specialist and deaf-blind transition specialist are both involved in this effort. This remained agency practice in PY 16, PY 17 and PY 18.

Impediments: None

Goal 4: Coordinate with community resources to maximize comparable benefits and improve services for our Supported Employment clients

Progress: The agency networked with community support services through the Office of Developmental Disability Services of the state to identify ongoing support services for individuals with significant disabilities who require supported employment services. This remained agency practice in PY 16, PY 17 and PY18.

Impediments: None.

Goal 5: Maintain the number of individuals served in the program and increase our outcomes in integrated settings with supports.

Progress: The agency served 34 supported employment clients in PY 15. Two supported employment cases were closed successfully. In PY 16 OCB served 59 Supported Employment Clients and successfully closed 3 clients. In PY 17 OCB served 38 SE Clients and successfully closed 5. In PY 18 OCB served 32 and successfully closed 11.

Impediments: None.

### B. Describe the factors that impeded the achievement of the goals and priorities

Progress and factors that may have impeded progress are outlined in the previous section, p.2.A. Overall OCB did not encounter significant impediments to moving forward with the achievement of Supported Employment goals and priorities.

### 3. The VR program's performance on the performance accountability indicators under section 116 of WIOA

The following is a representation of The Oregon Commission for the Blind's performance in the WIOA Performance Indicator areas by PY:

2 <sup>nd</sup> Quarter Employed	PY2017: 62.38%, PY2018: 51.98%
4 <sup>th</sup> Quarter Employed	PY2017: 25.74%, PY2018: 19.21%
Credential Attainment:	PY2017: 14.1%, PY2018: 17%
Measureable Skills Gain	PY2017: 53.33%, PY2018: 46.20%
Median Earnings 2 <sup>nd</sup> QTR after Exit	PY2017: \$4328.37, PY2018: \$3213.36

The following are projections of trends in these WIOA performance evaluation areas. These numbers don't represent targets, but a gradual and conservative forecast of the direction OCB's performance is moving. These projections are not a required part of the program specific portion of Oregon's Combined State Plan. The only mandated target is for this period is for the combined state Measureable Skills Gain target, reflected in the common elements portion of Oregon's Combined State Plan. The MSG targets reflected here are for OCB's program specific performance.

PY2019: 53%, PY2020: 54%, PY2021: 55%
PY2019: 21.5%, PY: 22.5%, PY2021: 23.5%
PY2019: 18%. PY2020: 19%, PY2021: 20%
PY2019: 48.20%, PY2020: 50.20%, PY2021: 52.20%

### 4. How the funds reserved for innovation and expansion (I&E) activities were utilized

OCB did not receive or spend funds specifically designated as reserved for innovation and expansion (I&E). However, OCB incorporates innovation and expansion into all of service planning and delivery. Innovation and expansion activities OCB has worked on from PY2015 through PY2018 include:

Workforce Services Team: The workforce Team was created in PY18, and is composed of eight staff: One Workforce Innovation manager, three Business Relations Coordinators (BRC's), and five Assistive Technology (AT) specialists. The BRC staff are credentialed Vocational Rehabilitation Counselors. Though the BRC role is primarily business facing, the complex needs of OCB's clients are addressed from the specialized education of the BRC staff holding VRC credentials. The BRC's partner with AT staff in education and outreach activities to businesses, workforce system partners, and other key stakeholders. BRC and AT staff work jointly with VR counselors and CRP's to create positive employment outcomes that benefit OCB's dual customers: business partners and clients experiencing vision loss. Two BRC staff are assigned to provide state-wide services to OCB VR clients, one BRC is assigned specifically for providing these functions to OCB's transition youth/student population.

Progressive Employment: OCB began working with the Institute for Community Inclusion through the University of Massachusetts, Boston as a part of a Learning Collaborative research project in PY 15. OCB has incorporated a Progressive Employment (PE) model into all aspects of vocational activities. Progressive Employment is a dual customer model that is well suited for jobseekers who might have limited skills, little work history and significant challenges to employment in concert with businesses who may be hesitant to hiring people with disabilities due to perceived risk and lack of understanding of accommodative resources and approaches. PE packages readily available VR pre-employment options and coordinates with rehabilitation counseling, job placement and business account management to the benefit of WIOA's dual customers – the jobseekers and the business partner. This is a low risk opportunity for employers as it lets them get to know the jobseeker as a candidate and as a person prior to making a commitment to hire. This approach affords creativity and options for the job seeker experiencing vision loss.

Community Rehabilitation Provider training: OCB developed and implemented a CRP onboarding and training process during the first state plan period. All Community Rehabilitation Providers OCB engages with complete agency onboarding that outlines OCB policies and processes and provides a baseline understanding of the issues, perspectives and resources available to Oregonians' experiencing vision loss.

Project E3: Project E3 stands for Educate, Empower and Employ, a VRTAC initiative to improve services to people with disabilities who have been underserved in rural communities. OCB staff working in rural areas of Southwest Oregon have received technical assistance for improving employment outcomes for underrepresented Oregonians experiencing vision loss. Interventions

include developing communities of practice, working toward improving options for rural transportation and leveraging additional community, public and private resources when possible.

OCB participated in a Learning Collaborative Project on strategies for Business Engagement for vocational rehabilitation agencies that began in 2017. This effort helped OCB develop a robust, innovative and ongoing approach about new ways to successfully partner with businesses within the context of WIOA.

### q. Quality, Scope, and Extent of Supported Employment Services

Include the following:

#### 1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities

OCB is committed to providing Supported Employment services to individuals with disabilities cooccurring with visual impairment that make long-term supports necessary for the individual's success in maintaining integrated and competitive employment, including developmental disabilities, traumatic brain injury (TBI) and disabilities due to mental health.

OCB believes that all individuals are capable of integrated and competitive work with the right supports in place, and the state has over the years reduced options for sub-minimum wage employment. The new regulations requiring the agency to provide pre- employment transition services for youth with disability before certification for sub-minimum wage work is expected to have little impact on the agency, as this is the direction the state has been moving towards. A challenge for supported employment is that the comparable benefit resources available in Oregon State to provide extended long-term support services are limited. OCB works in collaboration with all available resources and partners on cases that have co-occurring disabling conditions that make long-term supports necessary. The OCB continues to work with employers and other natural supports to identify funding for long-term support services.

In Oregon, the Department of Human Services provides funding for extended services for individuals with the most significant disabilities. This funding is routed through County

Developmental Disability Agencies via a client's Case Manager, and is contracted for each individual through Brokerages.

These agencies work with the individuals and their social support systems to develop a plan for ongoing supports, which can be used for a variety of purposes, one of which are long term employment supports.

Training and post-employment services that will lead to supported employment are provided by OCB. Once the individual is transitioned from agency vocational rehabilitation support, another agency or resource provides extended services. Services we provide include: the provision of skilled job coaches who accompany the worker for intensive on the job training, systematic training, job development, follow up services, regular observation or supervision at the training site, rehabilitation technology, and other services needed to support the individual in successful employment.

Community Rehabilitation Providers (CRPs): OCB contracts with private, for- and not- for- profit vocational rehabilitation service providers for general and supported employment services. The most commonly purchased CRP services include: vocational evaluation, trial work experience, job placement and job retention. In addition, OCB is committed to the provision of Supported Employment vocational services, as needed, for up to/not to exceed four years. OCB engages in training CRPs on topics such as the context, issues and skills associated with vision loss.

#### 2. The timing of transition to extended services

OCB provides Supported Employment services to individuals with disabilities co-occurring with visual impairment that make long-term supports necessary for the individual's success in maintaining integrated and competitive employment, including developmental disabilities, traumatic brain injury (TBI) and disabilities due to mental health.

OCB believes that all individuals are capable of integrated and competitive work with the right supports in place, and the state has over the years reduced options for sub-minimum wage employment. The new regulations requiring the agency to provide pre-employment transition services for youth with disability before certification for sub-minimum wage work is expected to have little impact on the agency, as this is the direction the state has been moving towards. A challenge for supported employment is that the comparable benefit resources available in Oregon State to provide extended long-term support services are limited. OCB works in collaboration with all available resources and partners on cases that have co-occurring disabling conditions that make long-term supports necessary. The OCB continues to work with employers and other natural supports to identify funding for long-term support services.

In Oregon, the Department of Human Services provides funding for extended services for students with the most significant disabilities. This funding is routed through County Developmental Disability Agencies via a client's Case Manager, and is contracted for each individual through Brokerages.

These agencies work with the students and their social support systems to develop a plan for ongoing supports, which can be used for a variety of purposes, one of which are long term employment supports.

Training and post-employment services that will lead to supported employment are provided by OCB up to four years. Once the student is transitioned from agency vocational rehabilitation support, another agency or resource provides extended services. Services we provide for up to four years include: the provision of skilled job coaches who accompany the worker for intensive on the job training, systematic training, job development, follow up services, regular observation or supervision at the training site, rehabilitation technology, and other services needed to support the individual in successful employment.

#### Vocational Rehabilitation (Blind) Certifications

States must provide written and signed certifications that:

1. The (enter the name of designated State agency or designated State unit, as appropriate,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA[14], and its supplement under title VI of the Rehabilitation Act[15];

Enter the name of designated State agency or designated State unit, as appropriate

Designated State Agency: The Oregon Commission for the Blind

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency)[16] agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan[17], the Rehabilitation Act, and all applicable regulations[18], policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan[17] of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;

Enter the name of designated State agency

The Oregon Commission for the Blind

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan[19], the Rehabilitation Act, and all applicable regulations[20], policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Secretary of Education.

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement;

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.

7. The (enter the name of authorized representative below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;

Enter the name of authorized representative below

Dacia Johnson

8. The (enter the title of authorized representative below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;

Enter the title of authorized representative below

Executive Director, The Oregon Commission for the Blind

9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

#### Footnotes

[14] Public Law 113-128.

[15] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

[16] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[17] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[18] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR

part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations.

[19] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[20] Applicable regulations, in part, include the citations in footnote 6.

#### **Certification Signature**

Signatory information	Enter Signatory information in this column
Name of Signatory	Dacia Johnson
Title of Signatory	Executive Director, The Oregon Commission for the Blind
Date Signed	02/28/2020

#### Assurances

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: **The State Plan must provide assurances that:** 

The State Plan must include	Include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:Administration of the VR services portion of the Unified or Combined State Plan:	
3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act	
3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):	
3.b.(A) "is an independent State commission" (Yes/No)	Yes
3.b.(B) "has established a State Rehabilitation Council" (Yes/No)	No
3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act	
3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3)	
3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as	Yes

The State Plan must include	Include
appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	
3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	No
3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan	Yes
3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act	
3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act	
3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act	
3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act	
3.I. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities	
3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act	
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:	
4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	
4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act	
4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)	Yes
4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act	
4.e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	

The State Plan must include	Include
4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act	
4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14)of the Rehabilitation Act	
4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs	
4.j. With respect to students with disabilities, the State,	
4.j.i. Has developed and will implement,	
4.j.i.I. Strategies to address the needs identified in the assessments; and	
4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and	
4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))	
5. Program Administration for the Supported Employment Title VI Supplement:	
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act	
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment to the Rehabilitation Act	
5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act	1
6. Financial Administration of the Supported Employment Program:	
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act	
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when	•

The State Plan must include	Include
providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act	
7. Provision of Supported Employment Services:	Yes
7.a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act	
7.b. The designated State agency assures that:	
7.b.i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act	
7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act	

#### Vocational Rehabilitation Program (Blind) Performance Indicators

#### Performance Goals for the Core Programs

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

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

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

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

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

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

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

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

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

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

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

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

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

Performance Indicators	PY 2020	PY 2020	PY 2021	PY 2021
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter After Exit)	Baseline	Baseline	Baseline	Baseline

PY 2020	PY 2020	PY 2021	PY 2021
Expected Level	Negotiated Level	Expected Level	Negotiated Level
Baseline	Baseline	Baseline	Baseline
Baseline	Baseline	Baseline	Baseline
26.5	Pending	26.5	Pending
Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>
	Expected Level Baseline Baseline 26.5	Expected LevelNegotiated LevelBaselineBaselineBaselineBaseline26.5Pending	Expected LevelNegotiated LevelExpected LevelBaselineBaselineBaselineBaselineBaselineBaseline26.5Pending26.5

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

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

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult program, Dislocated Worker program, Youth program, Wagner-Peyser Act program, Adult Education and Family Literacy Act program, and the Vocational Rehabilitation program— and also submit relevant information for any of the eleven partner programs it elects to include in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. 24 If included, Combined State Plan partner programs are subject to the "common planning elements" in Sections II-IV of this document, where specified, as well as the program-specific requirements for that program.

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

#### Temporary Assistance for Needy Families (TANF)

States that include TANF in the Combined State Plan must outline how the State will meet the requirements of section 402 of the Social Security Act including how it will:

(OMB Control Number: 0970-0145)

a. Conduct a program designed to serve all political subdivisions in the State (not necessarily in a uniform manner) that provides assistance to needy families with (or expecting) children and provides parents with job preparation, work, and support services to enable them to leave the program, specifically cash assistance, and

## become self-sufficient (section 402(a)(1)(A)(i) of the Social Security Act)

The Job Opportunity and Basic Skills (JOBS) Program is Oregon's employment and training program. Education, training and job placement services are provided to TANF single-parent and two-parent families with the goal of helping prepare for, find and keep a job. Job retention and wage enhancement services are provided to individuals transitioning from TANF or the Pre-TANF Program.

JOBS program services are planned for and provided through contracted partners as well as through a network of workforce partnerships including local Workforce Development boards (LWDBs), Employment Department offices, community colleges and other community partners that provide family stability services such as mental health and substance use disorder services. Coordinated service delivery planning, for both workforce and family stability-focused resources, are conducted through local planning meetings.

State leadership and technical assistance support local JOBS program efforts. A core set of mandatory procedures and services are in place in all areas. However, service delivery mechanisms and program design may vary among the 16 Districts due to differences in local needs and resources.

To provide JOBS services to working TANF participants to help them transition from TANF to employment, DHS staff uses a strength-based engagement and case management approach that works holistically with the entire family. The intent of engagement and case management is to help families move forward based on their needs and become self-supporting. DHS respects and empowers families by recognizing they are capable, have strengths, and have resources that can help them take control of their lives. Benefit delivery is integrated with self-sufficiency enhancing services. The outcome of engagement and case management is increased family accountability and success for individual families in reaching and sustaining their goals. Engagement and case management takes a team effort. The team consists of the participant, the Family Coach, branch staff and community partners the participant may be working with.

JOBS services include various levels of Job Preparation and Placement services, Retention and Wage Enhancement services, Self-Sufficiency and Intervention services, Youth and Child services and Teen Parent services.

b. Require a parent or caretaker receiving assistance to engage in work (defined by the State) once the State determines the parent or caretaker is ready to engage in work, or once he or she has received 24 months of assistance, whichever is earlier, consistent with the child care exception at 407(e)(2) (section 402(a)(1)(A)(ii) of the Social Security Act)

The State has not defined criteria for determining whether a parent or caretaker relative is ready to engage in work before 24 months. The State's policy is to engage parents and caretaker relatives in work or other activities leading to self-sufficiency from the applicant stage, rather than allowing them two years on assistance before such engagement. DHS does this primarily because we believe that it is better for the parents and caretaker relatives to be engaged in family and economic stability activities during the period in which they are subject to federal time limit policies.

c. Ensure that parents and caretakers receiving assistance engage in work in accordance with section 407 (section 402(a)(1)(A)(iii) of the Social Security Act). Consistent with the required strategic elements discussed in section II (a)(2) herein, provide a specific analysis of how the State's workforce development activities are addressing employment and training services for parents or caretakers receiving assistance

The State will ensure that parents and caretakers receiving assistance under the program engage in work activities through the JOBS Program.

The following JOBS program components (activities) are available in every service district in some capacity either through contracts or by community partners:

- 1. Adult Basic Education: Activities that address basic literacy or math skills for adults 20 years of age and older without a high school diploma or GED. Activities need to be related to an employment opportunity requiring a specific literacy or numeracy grade level.
- 2. *Child Activities*: Activities that enable the participant to gain skills to successfully parent, balance work and family and contribute to the well-being and health of the children in the family.
- 3. *Community Service Program*: Unpaid work that must be performed for the direct benefit of the community. Appropriate fields for this activity include health, social services, environmental protection, education, recreation, public facilities, safety and child care.
- 4. *Crisis Intervention*: Short-term services to identify and address an immediate crisis needed to protect family stability and safety.
- 5. *Drug and Alcohol Services*: Activities to help participants identify and overcome substance use disorders that prevent or limit their employability and self-sufficiency.
- 6. *Domestic Violence Services*: Activities to help participants who are experiencing a domestic violence situation.
- 7. *English as a Second Language*: Activities for participants for whom English is not their first language to improve English proficiency.
- 8. *Family Support and Connections:* Contracted services to help families maintain the safety and well-being of their children, thus preventing Child Welfare involvement.
- 9. *High school or GED:* Activities for any participant who is working toward a high school diploma or GED.
- 10. Job Search: Activity to help participants prepare, locate and retain future employment.
- 11. *Job Skills Training*: Activity designed to provide unpaid training required by an employer and that is needed to gain the skills necessary to be hired or to retain or advance in employment.
- 12. *JOBS Plus*: A program under Oregon law that provides TANF participants with subsidized employment, while paying their benefits as wages from the work-site assignment. Each JOBS Plus participant receives a \$10 supplement in addition to their benefits that are paid as

wages. Wage supplements, employer reimbursements and the \$10 supplement are funded with State funds and charged as MOE.

- 13. *Life Skills*: Activities and classes that offer development of skills that prepare participants to be successful in the workplace and daily living.
- 14. *Medical-Related Services:* Activities to assess and address health concerns that prevent or limit employment and self-sufficiency. [Support services for medical-related services may be issued to meet participant need, including for childcare and transportation. Support services are not issued to pay for the medical services themselves.]
- 15. *Mental Health*: Activities to reduce barriers to employment caused by mental health issues. Activities must be determined to be necessary by a qualified medical professional.
- 16. *Microenterprise*: Self-employment for participants with small business opportunities that are approved by a third-party entity.
- 17. On-the-Job Training: Activity for: paid employees who are in a non-JOBS Plus subsidized employment placement; for students in an unpaid internship; for students in a federal or state work study position; or for TANF teen parents, TANF young parents and TANF non-parenting teens participating in the Summer Youth Employment Program.
- 18. *Program Entry*: Activities including JOBS Program appointments, assessments to identify a family's needs and strengths, determination of JOBS Program status and mutually development of a case plan.
- 19. *Rehabilitation Activities*: Activities to reduce barriers caused by ongoing physical, medical and/or other disabilities. Must be determined necessary and be documented by a health professional.
- 20. Self-*Initiated Training:* Activity in which participants are enrolled in a two- or four-year degree program, earning credit towards a college degree.
- 21. Supported Work: Activities for participants who need more intensive support, skills training and job-related intervention and counseling at an unpaid work site or work simulation activity.
- 22. SSI Application Process: Services through the Disability Liaisons and other resources to assist participants in the process of applying for or appealing SSI or SSDI.
- 23. *Stabilized Living*: Activities that enable a participant to stabilize housing concerns that prevent or limit employment or self-sufficiency.
- 24. *Working*: Unsubsidized employment for current TANF participants in the public or private sector.
- 25. *Work Experience*: Unpaid work to develop work habits, skills, training and knowledge to obtain permanent employment. Work is conducted at a work site and is available through private for-profit, non-profit or public sector.
- 26. Vocational Training: Activity that provides participants with up to 18 months access to specific vocational educational training that will lead to a certificate, job offer or career.

d. Take such reasonable steps as the State deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds

## provided by the Federal Government (section 402(a)(1)(A)(iv) of the Social Security Act)

All information about individuals and families is confidential. The agency will not release or disclose individual and family information, except as specifically authorized in administrative rule, or as ordered by a court.

Confidential information includes all verbal, written, printed or electronic display of data that can identify any specific individual's name, SSN or address. Confidential data cannot be released in any format, including mailing labels; PC downloads on disk or spreadsheet, or other computer printouts, unless specifically authorized.

All agency staff is given training on keeping applicant and recipient information confidential. Each employee is asked to sign a statement that they have read and understood the importance of confidentiality. These procedures are also extended to our community partners to ensure they uphold similar standards as the agency does on the information of individuals and families.

#### e. Establish goals and take action to prevent and reduce out-of-wedlock pregnancies, with special emphasis on teenage pregnancies (section 402(a)(1)(A)(v) of the Social Security Act)

Oregon has a long-standing history of teen pregnancy prevention efforts. The Oregon Youth Sexual Health Plan is the guiding document for pregnancy prevention efforts. Through a collaborative working relationship, the Oregon Youth Sexual Health Plan brings together a public/private partnership representing a variety of beliefs and approaches to leverage assets, skills, services and expertise. The Plan was designed to significantly enhance our individual efforts to promote the health and well-being of Oregon's young people.

The Oregon Youth Sexual Health Plan is a guide for planning programs, advocating for policy, procuring funding and educating stakeholders to support Oregon youth sexual health. Local communities use the Plan as a framework for addressing teen pregnancy prevention and promoting healthy sexuality in their communities. The Plan has been used to leverage funding for increased pregnancy prevention programming throughout the state, especially in areas with significantly elevated teen pregnancy rates including rate disparities identified in different racial and ethnic populations.

f. Conduct a program designed to reach State and local law enforcement officials, the education system, and relevant counseling services, that provides education and training on the problem of statutory rape so that teenage pregnancy prevention programs may be expanded to include men (section 402(a)(1)(A)(vi) of the Social Security Act)

The State of Oregon certifies that it will conduct a program designed to reach State and local law enforcement officials, the education system and relevant counseling services that provides education

and training on the problem of statutory rape so that teenage pregnancy prevention programs and intimate violence prevention programs may be expanded in scope to include men.

The Oregon Health Authority Office of Public Health's "*Oregon Violence Against Women Prevention Plan*" identifies six major goals, along with strategies and potential implementation activities:

This plan is available at http://www.ncdsv.org/images/ODPH\_OregonVAWPreventionPlan\_10-2005.pdf.

The OHA Reproductive Health and Women's Health Programs develops and distributes media campaign efforts and materials to professionals working with the public specific to education on the problem of statutory rape, which includes the victimization of men.

g. Implement policies and procedures as necessary to prevent access to assistance provided under the State program funded under this part through any electronic fund transaction in an automated teller machine or pointof-sale device located in a place described in section 408(a)(12), including a plan to ensure that recipients of the assistance have adequate access to their cash assistance (section 402(a)(1)(A)(vii) of the Social Security Act)

Effective February 6, 2013, Oregon updated administrative rule and policy to restrict use of and access to TANF cash benefits in an electronic benefit transaction at casinos, gaming establishments, liquor stores and retail establishments that provide adult-oriented entertainment.

- February 2013, Oregon updated TANF-related materials and notified TANF recipients about these restrictions.
- Effective July 1, 2015, Oregon updated administrative rule, policy and TANF-related materials to treat reported use of or access to TANF cash benefits in an electronic benefit transaction at casinos, gaming establishments, liquor stores and retail establishments that provide adult-oriented entertainment as a client-error overpayment. There is no threshold for these overpayments.

Effective January 1, 2017, Oregon updated administrative rule, policy and TANF-related materials to clarify that the restrictions on use and access of TANF cash assistance in an electronic benefit transaction include retailers that primarily or exclusively sell beer or wine and retailers that primarily or exclusively sell or feature adult-oriented videos or movies. These updates also include language stating the restrictions apply when TANF benefits are used or accessed in Oregon, outside of Oregon or on Tribal lands and that the restrictions apply to using or accessing TANF cash benefits from a private bank account.

Each December, Oregon notifies affected merchants of these restrictions in an annual merchant mailing. The annual merchant mailing includes stickers for merchants to post on ATM or point of sale devices and indicate that Oregon's electronic benefit transaction card is not to be used in that location.

To ensure recipients have adequate access to their cash assistance, Oregon administrative rule and policy require the department to take reasonable steps to ensure recipients have adequate access to cash benefits. This may include issuing TANF benefits via direct deposit into the recipient's bank

account or issuing TANF benefits via paper check when necessary. In addition, Oregon has worked with its electronic benefit transaction service provider so that TANF recipients are able to access their cash benefits at a location near their home. Oregon also provides individualized services as needed for TANF recipients with unique circumstances, including those recipients who have a disability.

h. Ensure that recipients of assistance provided under the State program funded under this part have the ability to use or withdraw assistance with minimal fees or charges, including an opportunity to access assistance with no fee or charges, and are provided information on applicable fees and surcharges that apply to electronic fund transactions involving the assistance, and that such information is made publicly available (section 402(a)(1)(A)(viii) of the Social Security Act)

TANF recipients may access cash benefits through point-of-sale (POS) devices at some retailers and at participating Automated Teller Machines (ATM's). TANF recipients are not charged for a POS cash purchase, POS cash purchase with cash back or POS cash withdrawal. TANF recipients who use ATM's to access their cash benefits are not charged a transaction fee but may be charged a bank surcharge. To alert TANF recipients of the possibility of surcharges related to accessing TANF cash benefits via ATM's, each recipient is given a pamphlet that includes this information. This information is also available on the DHS website.

i. Indicate whether it intends to treat families moving from another State differently from other families under the program, and if so how (section 402(a)(1)(B)(i) of the Social Security Act)

The State will not treat families moving into Oregon from another State differently than other families under the program.

j. Indicate whether it intends to provide assistance to non-citizens, and if so include an overview of the assistance (section 402(a)(1)(B)(ii) of the Social Security Act)

The State will continue to provide assistance under the program to individuals who are not citizens of the United States to the extent permitted by law.

k. Set forth objective criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment, including an explanation of how it

#### will provide opportunities for recipients who have been adversely affected to be heard in a State administrative or appeal process (section 402(a)(1)(B)(iii) of the Social Security Act)

The TANF cash assistance program is operated State-wide, with a Countable and Adjusted income limit and payment standard. In addition, centrally determined, consistent eligibility requirements are established and utilized.

#### Non-Financial Eligibility Requirements include (1-9):

- 1. **Residency**. Both the parent(s) or caretaker relative(s) and the dependent child must be a resident of Oregon and intend to remain in Oregon
- 2. **Citizen/Alien Status**. Individuals must be a US citizen or qualified non-citizen except in situations of domestic violence.
- 3. Social Security Number (SSN). Individuals must supply or apply for a SSN.
- 4. **Pursuing and Assigning Benefits/Assets**. Individuals must pursue assets to which they have a legal right to claim.
- 5. **Age/School**. A dependent child must be under the age of 18 or age 18 and regularly attending school full-time.
- 6. **Caretaker Relative**. A dependent child must live with a caretaker relative. A caretaker relative is the person, regardless of age, who is responsible for the care, control and supervision of the dependent child and is related to the child in one of the ways listed below.
- 7. Employment Separation TANF Denial or TANF Closure. The parent or caretaker relative in the need group must not be separated from his or her *most recent job of 100 hours or more per month* for any of the following reasons: Discharged or fired without good cause, labor dispute or voluntary quit without good cause. A need group is not eligible for TANF program benefits for 120 days from the date a caretaker relative was separated from employment without good cause.
- 8. **Employability Screening and Overview of the JOBS Program.** Each caretaker relative in the need group who is authorized to work in the United States must complete an employability screening.
- 9. **Two-week Cooperation Period -**When a TANF grant closes within three months prior to the new filing date *and* at least one adult in the household is actively disqualified at the time of case closure, the disqualified adult must complete a two-week cooperation period before TANF is opened unless the disqualified person is now JOBS-Exempt or if the department determines good cause for the two-week cooperation period.

#### **TANF Eligible Individuals**

- The TANF application must include a dependent child or unborn and the following household members:
- Parent(s) of a dependent child or unborn child
- Siblings of the dependent child under age 18 or age 18 and attending school full time.
- Needy caretaker relatives of the dependent child, their spouse and their dependent children.
- Caretaker relatives.

• Minor parents with their dependent child(ren) when minor parent lives with an adult relative who *is not* their parent, or, they are in the home with parents and the parents are not applying for TANF for the minor parent or any of the minor parents' siblings.

#### **TANF Financial Eligibility Requirements**

The financial eligibility requirements include meeting the income and resource limits for the program. Income and resources are assets.

- Resource Limit: For TANF Applicants: \$2,500 For all other TANF Recipients: \$10,000.
- Calculating Income for TANF Benefits -\_Countable income is adjusted by applying the 50
  percent of earned income deduction to the earned income of every member of the financial
  group.
- Exit Income Limit Effective July 1, 2016, Oregon adjusted the countable and adjusted exit income limits for TANF recipients. This policy change increases the earned income limit threshold that a TANF household must exceed before cash benefits end.

#### TANF Benefit Issuance

TANF benefits are issued the first of each month. The State of Oregon issues TANF benefits (except for direct deposit) using Electronic Benefit Transfer (EBT).

#### **Child Care Payments**

DHS makes child care payments on behalf of TANF and JOBS participants directly to the child care provider. To be eligible for payment, providers must be listed and approved by DHS. Child care providers who are legally exempt from licensing by the Early Learning Division, Office of Child Care (OCC) must have passed a criminal and child protective services records check on themselves and others who have access to the children in care.

#### **Underpayments**

For underpayments, DHS authorizes restoration or supplemental payment of TANF cash if a benefit group received fewer benefits than it was entitled to due to a timely reported change, administrative underpayment, hearing decision, repayment for overpayment exceeded what was owed, court decision, or an Intentional Program Violation (IPV) disqualification is reversed.

#### **Redetermination**

TANF eligibility is reviewed at redetermination. Redetermination includes completion of a new application and in most cases, having a face-to-face interview in the office. The schedule for redetermination of TANF eligibility is as follows:

- At least once every six months for filing groups with an open JOBS plan and who are not participating in JOBS or who have an active JOBS disqualification.
- At least once every 12 months for all other TANF filing groups.
- At least annually for child welfare services.

#### Engagement and Case Management

Engagement and case management consist of the following primary activities:

• Screening & Assessment includes all the interactions DHS has with families, from initial branch contact and screening, through intake and engagement and case management contacts. Initial screening for family strengths, needs and goals is based on information gained from submitted forms as well as from the interview. The Family Assessment must be offered within 90 days of TANF approval at both certification and recertification. All branch staff and contractors with family contact can contribute to assessment of family needs based

on their interactions with the family. Rapport and trust are built by helping families identify and address their own issues.

- **Brokering for resources**, including communication with partners and case staffing, ensures that the most appropriate services are provided to the families. Brokering also involves continual evaluation of each service's usefulness and success. Brokered services include not only case plan activities and local resources but DHS resources, Social Security, child support and other benefits.
- **Case plans** are the road map for the family in their journey toward enhanced self-sufficiency. The results of the assessment are used to help the family choose self-sufficiency enhancing services and the Family Coach acts as a broker to access these services. Case plans are individualized based on family need and can be added to and adjusted over time.
- Eligibility determination and benefit issuance are primary responsibilities of DHS. These services are integrated with case planning aimed at increasing self-sufficiency.
- **Progress evaluation** allows DHS to maintain successful case plans and accurate benefit delivery.
- Narration and computer entry are the means by which benefits are provided and case activities recorded. They also enable DHS to collect and evaluate data to continually improve program services.

#### **Re-engagement Process**

The re-engagement process is used to reconnect the participants with their case plan, goals and steps needed to address self-sufficiency, to establish whether the participant is able to complete their case plan and to address any barriers to participation.

Disqualifications are only applied when it is determined that the participant is refusing to participate in their case plan and there are no child safety risks anticipated as the result of impacts of a penalty.

The JOBS re-engagement process provides an opportunity to determine good cause for failure to cooperate with the JOBS program and to help participants and potential participants resolve disputes and misunderstandings. This includes disputes about case plans, JOBS support service payment amount, irregular attendance at assigned JOBS activities, missed appointments, failure to participate in a JOBS component and refusal to accept or maintain employment.

Participants, DHS staff and JOBS contractors can all request re-engagement on JOBS participation disputes. Re-engagements are intended to resolve disputes quickly and fairly by making an opportunity for prompt resolution available to all parties.

#### Good Cause

Good Cause is what DHS considers as valid circumstances that prevent a participant from cooperating with elements of their individualized case plan. It is the participant's responsibility, with the assistance of DHS, to provide evidence to establish good cause for non-cooperation and to work with the JOBS program staff to try to resolve problems that interfere with cooperation. Participants meeting federal participation rate requirements will be granted good cause. It is important to determine whether the participant is unable or unwilling to cooperate with their case plan.

#### **Hearings & Notices**

A claimant may have a hearing on a case decision if any of the following applies:

- 1. DHS has not acted on a request or application for TANF within 30 days of the filing date.
- 2. DHS claims that an earlier TANF payment was an overpayment.
- 3. The claimant is protesting a DHS decision to deny, reduce or close benefits.

- 4. The claimant asks for a hearing to determine if the waiver of an Intentional Program Violation hearing was signed under duress. The request must be made within 90 days of the date the waiver was signed.
- 5. The claimant contends that the Department previously under-issued public assistance and the Department denies the claim.
- 6. DHS issues a notice of intentional program violation and the claimant has not signed a waiver of hearing.
- 7. Denial of TA-DVS or a denial of a TA-DVS payment.
- 8. Denial of support services.

#### A Request for Hearing

- A DHS's Administrative Hearing Request form is filled out and signed by the claimant or the claimant's representative and is received by DHS no later than the 45th day following the date of the TANF decision notice, or 90 days from a benefit reduction due to non-cooperation with a case plan.
- Reasonable notice of the hearing is served upon the claimant either personally or by regular mail. Hearings are held by the Office of Administrative Hearings, which is independent from the Department of Human Services.

#### **Expedited Hearings**

An expedited hearing is a telephone hearing held within five working days of DHS's receipt of the written hearing request, unless the claimant requests more time. In an expedited hearing, the Office of Administrative Hearings issues a Final Order within three working days from the date of the hearing.

When benefits are being reduced or terminated, a claimant has the right to an expedited hearing if:

- Claimant disagrees with a denial of continued benefits pending a requested hearing.
- DHS denies an application for a support service payment or a payment for a basic living expense that was authorized,
- DHS reduces or closes a support service payment, or
- DHS does not issue a JOBS support service payment within required time frames.
- A Temporary Assistance for Domestic Violence application is denied or the applicant does not receive a decision on the application by the close of the second business day following the date the application is complete or the applicant or recipient disputes any payment provided.

#### **Disqualification**

A disqualification is initiated only after the individual has had an opportunity to participate in the reengagement process that includes a determination by DHS of whether the individual had good cause for failing to comply. The effects of a JOBS disqualification are progressive. Once a disqualification is imposed, it affects benefits according to the following schedule until the disqualification ends.

There are four levels of disqualification:

- 1. At the first level, the need group's benefits are reduced by 25 percent.
- 2. At the second level, the need group's benefits are reduced by 50 percent.
- 3. At the third level, the need group's benefits are reduced by 75 percent.
- 4. At the fourth level, the need group's benefits are reduced by 100 percent.

After the fourth level, TANF benefits are closed and the family is ineligible for TANF benefits for two consecutive months if the individual did not begin to cooperate prior to the end of the fourth level. Individuals who have been disqualified must demonstrate cooperation for two consecutive weeks after which the disqualification ends and cash benefits are restored.

DHS encourages and supports participation, using disqualifications only as a last resort; i.e., only when all attempts to encourage and facilitate participation have failed.

I. Indicate whether the State intends to assist individuals to train for, seek, and maintain employment (Section 402(a)(1)(B)(v) of the Social Security Act)—

1. Providing direct care in a long-term care facility (as such terms are defined under section 1397j of this title); or

2. In other occupations related to elder care, high-demand occupations, or occupations expected to experience labor shortages as, determined appropriate by the State for which the State identifies an unmet need for service personnel, and, if so, shall include an overview of such assistance.

At this time, Oregon does not have plans in place to assist individuals to train for, seek and maintain employment providing direct care in a long-term care facility or in other occupations related to eldercare for which the state identifies an unmet need for service personnel.

m. Provide for all MOE-funded services the following information: the name of the program benefit or service, and the financial eligibility criteria that families must meet in order to receive that benefit or service. In addition, for TANF MOE-funded services (co-mingled or segregated MOE) describe the program benefit provided to eligible families (SSP services do not have to include a description but the Department of Health and Human Services encourages it) (§263.2(b)(3) & §263.2(c) preamble pages 17826-7)

TANF and TANF MOE funds are spent on several Oregon programs that meet the requirements of federal law and regulations. These items include:

• **Temporary Assistance for Needy Families (TANF)**program provides case management, engagement supports and cash assistance to low-income single and two-parent families with minor children. It is designed to promote personal responsibility and accountability for parents. The goal of the program is to reduce the number of families living in poverty through employment services and community resources. Services to single parent families are provided with a combination of TANF Federal Funds and State Maintenance of Effort (MOE) funds. Services to two-parent families are provided with State-only non-MOE funds.

• Job Opportunity and Basic Skills (JOBS) is the State's TANF employment and training program. Individuals eligible for JOBS program services are those who are entering the TANF program, TANF recipients, individuals transitioning from TANF assistance, work-eligible noncitizens attached to a TANF case, and families participating in the State Family Pre-SSI/SSDI program. These services are provided with a combination of TANF Federal Funds and State MOE funds, or segregated TANF Federal Funds or State-only non-MOE, based on eligible family status.

Effective July 1, 2018, expanded JOBS services, including support services as needed, are available through JOBS contractors. These expanded services are for families who are not receiving TANF, have income at or below 250% of the Federal Poverty Level and include a parent or caretaker relative living with a dependent child under the age of 18. Expanded JOBS support services may be issued to help these families address short-term, crisis situations that last no more than four months. Expanded JOBS services and support services are provided with a combination of TANF Federal Funds and State MOE funds or State-only non-MOE.

- Summer Youth Employment Program (SYEP) serves TANF teen parents, TANF young parents age 16-24 years old and non-parenting TANF teens ages 16 to 18 years old. Although two areas of the state operate SYEP year-round, SYEP activities in the rest of the State last from May through October of each year. The intent of SYEP is to engage TANF teens and TANF teen parents in job preparation and training as well as to place the youth in a subsidized employment placement that matches their interest and skill level. TANF Federal funds and State MOE are used for SYEP. These funds are distributed to Oregon's Higher Education Coordination Commission, which oversees coordination of SYEP in partnership with local Workforce Development Boards. The TANF and MOE funds are used for youth wages and taxes; program coordination; activities including conducting assessments, orientations and providing skills workshops; and staff time required to set up work sites.
- **Employment Payments** are three monthly payments made to families who exit TANF due to obtaining unsubsidized paid employment and who remain at or below 350 percent of the Federal Poverty Level guidelines. Employment Payments are paid as follows: \$100 in the first month after TANF ends, \$75 in the second month and \$50 in the third month. Employment Payments are funded with TANF State MOE.
- Substance Use Disorder services are provided to both TANF families and families at risk of TANF. These non-treatment services are for the purpose of providing housing—room and board—to individuals who are dependent children, under age 18, and have a parent in an adult substance use disorder residential treatment program. This program allows children to reside with their parents while in a residential facility, keeping families intact during the treatment period, and increases the likelihood of the parent completing their treatment program. Completing the residential treatment program also helps parents care for their children. These services are funded with segregated TANF Federal Funds or TANF State MOE based Eligible families must have income at or below 250 percent of FPL.
- Child Care services include costs associated with providing child care services to TANF participants engaged in the JOBS program or other self-sufficiency activities and to low income working families. The financial eligibility for the Employment Related Daycare program is set at 185 percent of FPL at initial application with an exit limit of 85 percent of state median income or 250 percent of FPL, whichever is higher. The Oregon Department of Education also provides for Resource and Referral for quality child care and compliance monitoring services. In addition to Child Care Development Fund (CCDF) Federal funds and required State match and CCDF State MOE, both TANF Federal and State MOE funds help

fund these programs.

- Child care services provided at an on-site location in conjunction with a state-approved substance use disorder treatment facility or at a near-by child care facility location convenient to and identified by the treatment program. These childcare services are limited to four months or less and are provided to families with a child under the age of 18 who is living with a caretaker relative with income at or below 185 percent of FPL. The services are funded with TANF Federal Funds or State MOE except for child care services for ineligible noncitizens. Child care for ineligible noncitizens is funded with State-only, non-MOE funds.
- Family Support and Connections is a child abuse prevention program serving primarily TANF eligible families. Services include support and interventions to TANF or at-risk families intended to reduce the likelihood of child abuse and neglect. The short-term interventions include home visits, strengths/needs based family assessments, advocacy, individualized interventions, joint outcome based case planning and emergency services. The services are designed to increase parental protective factors and decrease the risk factors of child abuse and neglect.

A limited number of non-TANF families are provided access to this program. This program is funded by a combination of Community Based Child Abuse Prevention (CBCAP) funds, TANF Federal funds and State funds, some available as TANF State MOE. For 90 percent of the families served, the financial eligibility is the same as eligibility for Pre-TANF, TANF cash assistance, two-parent cash assistance, State Family Pre-SSI/SSDI and Post-TANF programs. There is no financial eligibility requirement for the other 10 percent of non-TANF families served. CBCAP funds represent 13 percent of the total Family Support and Connections program funding. CBCAP funds are used to fund services to non-TANF families. The remaining costs are charged to TANF and State MOE funds and are monitored on an annual basis and adjusted accordingly.

- Self-Sufficiency Services for Tribal TANF families are provided to families receiving Tribal TANF assistance through The Klamath Tribes or the Confederated Tribes of the Siletz Indians. Families eligible for Tribal TANF through The Klamath Tribes or Confederated Tribes of Siletz Indians are not eligible for TANF from the State. Through interagency agreements with the Tribes, additional services are offered, such as employment and training, child care, subsidized work experience and support to non-needy caretaker relative families. Eligibility is based on Tribal TANF eligibility. Segregated TANF State MOE funds are used. When capacity allows, families receiving Tribal TANF may also access liaison services through DHS to assist them in applying for Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI). This is provided through the JOBS program.
- **Refugee Services** are provided to eligible TANF refugee families through either the Refugee Case Services Project (RCSP) or through the local branch office. The RCSP provides cash coordination and some case management to refugees residing in Multnomah, Clackamas and Washington counties for eight months. Employment and training services are provided for 12 months.

The Office of Refugee Resettlement (ORR) provides social service funding for services to refugees who are not eligible for TANF. The TANF eligible families are better served through this extensive service delivery system and TANF federal funds are used to pay for the services provided to refugee families eligible for TANF. TANF State MOE may also be expended on these services. The financial eligibility for these services is the same eligibility used for TANF cash assistance and two-parent cash assistance. Refugees who reside outside the RCSP service area are served through the local branch office.

- State Family Pre-SSI/SSDI Program provides interim cash assistance, case management and professional level support to TANF eligible adults and their families in pursuing Supplemental Security Income (SSI) and Supplemental Security Disability Income (SSDI) benefits. The program is available to participants who have been assessed by the program's disability analysts as likely to be found eligible for SSI/SSDI. The program is voluntary but provides additional staff resources for those people selected to participate in the program. Selected individuals must sign an interim assistance agreement to repay the adult portion of their State Family Pre-SSI/SSDI grant to the State when they are found eligible for Federal disability program benefits. State Family Pre-SSI/SSDI expenditures are funded with State only non-MOE.
- **The two-parent program** provides cash assistance to eligible two-parent households. Twoparent households are funded with State only non-MOE funds.
- The Job Participation Incentive (JPI) is a \$10 per month food benefit provided to singleparent working families with a child under the age of 18 and who work a sufficient number of hours to meet federal TANF work participation rate requirements. Beginning June 2014, JPI was expanded to include two-parent working families. This expansion is called J82. JPI and J82 are funded with State MOE.
- Child Support Pass-Through and Disregard passes through recovered child support up to \$50 per child per month (not to exceed the amount of child support actually paid), with a \$200 maximum per family per month for TANF families. The pass-through amount is disregarded for eligibility purposes and is counted as TANF State MOE.
- **Prevention Services** to adolescents and teens focusing mainly on reproductive and sexual health as well as positive youth development. Services are available to youth regardless of financial or non-financial eligibility. A combination of Federal TANF and pregnancy prevention initiative local dollars fund these services. State MOE will be claimed only on eligible families that meet 250 percent of the Federal Poverty Level.
- **Pre-Kindergarten education** through the Oregon Department of Education provides State funded Oregon Head Start Pre-Kindergarten (OPK) services for families. This program claims State General Fund money received by OPK programs that do not also receive Federal Head Start funds as TANF State MOE. Family eligibility is based on 100 percent of the Federal Poverty Level guidelines although up to 20 percent of slots may be made available to children who are over-income. (Total State MOE claimed is reduced by 20 percent to compensate for the potential of over-income families.) Ten percent of enrollment is reserved for children with disabilities. These services are not available to the general public.
- Relief Nurseries through the Early Learning Division of the Oregon Department of Education provide comprehensive family services to children under the age of six in families who are experiencing multiple stresses linked to abuse and neglect. The portion of Relief Nurseries General Funds that are reported as MOE are calculated based on the percent of services provided to families who are Oregon Health Plan eligible, less those funds that are used to match Medicaid.
- Emergency Assistance includes:
- Child Welfare programs include non-IV-E Foster Care, Adoption Assistance, in-home services, family treatment and support services, family resources and support, tribal child welfare, special contracts, case management including intake CPS and in-home CPS and ongoing family preservation services to support maintaining the child in their own home or a home of a relative, or reunification of the family in a more timely manner. When required, eligibility for TANF-funded services is based on TANF non-financial eligibility, with financial eligibility based on 200 percent of the Oregon median family income for a family of four.

These eligibility factors are applied to the family from which the child was removed (must have lived with a relative within the prior six months) or to the family with whom the child resides (in-home services). This TANF eligibility applies to those families and services that do not meet IV-E eligibility. This eligibility is the same as that found in the State Emergency Assistance Plan that was in effect as of September 30, 1995. TANF eligibility is re-determined annually. All child welfare emergency assistance related services, including Adoption Assistance, are charged to segregated TANF federal funds only. In addition, State MOE may be used for other child-related services provided to families with financial eligibility based on 200 percent of the Oregon median family income for a family of four. These other child-related services include: Foster Care placement payments, enhanced supervision, respite care, basic needs (e.g., baby supplies, clothing, groceries), case planning (e.g., absent parent search/notification costs, ordering birth certificates, witness fees, interpreter or translation costs, attorney fees, non-medical transportation, mediation), counseling and therapeutic services (provided by a Non-Medicaid provider or provided to a parent who is not eligible for Medicaid), day care, education services (e.g., tutoring/study skills or camp), housing needs (e.g., home repair, housekeeping services, rent or fees, temporary shelter), parent training and therapeutic visitation.

- 2. Temporary Assistance for Domestic Violence Survivors (TA-DVS) program provides payments, not to exceed \$1,200 in a 90-day period, for services necessary to help victims of domestic violence address safety concerns and stabilize their living situation. Eligibility for these services is based on TANF cash assistance eligibility criteria, elements of which can be waived as explained later in the plan. Segregated TANF federal funds are used for these payments except for the items explained below. TANF State MOE funds are used to provide emergency medical services when other alternatives are not available and to provide program payments to victims whose citizenship and alien status are waived but who otherwise meet TANF eligibility, allowable under a State law provision.
- Housing Stabilization Program is administered by Oregon Housing and Community 3 Services (OHCS). TANF Federal funds along with TANF State MOE are expended to assist families with minor children who are homeless or unstably housed and at risk of homelessness. Priority is given to families receiving TANF or who are applying to receive TANF. Housing Stabilization payments, not to exceed \$8,000, may be issued to an eligible family over a four month period. Eligible families who receive a TANF-funded HSP benefit or service must have income below 250 percent of the Federal Poverty Line (FPL). Local HSP service providers collaborate with local DHS district offices to provide wrap-around services to TANF families who receive HSP benefits or assistance. Using funding sources other than TANF Federal funds or TANF State MOE, local HSP providers may continue to provide housing-related services to TANF families and those at-risk of TANF beyond the four-month limitation. Payments made by HSP service providers at the local level provide services such as, but not limited to, short-term housing costs, employment and self-sufficiency related expenses, transportation and case management to assist eligible households obtain and maintain stable housing.
- 4. The Working Family Tax Credit provides a refundable tax credit to cover the out of pocket costs of low-income child care consumers. The income test is based on adjusted gross income under 250 percent of FPL. The amount of Working Family Tax Credit claimed as TANF MOE is the amount of the tax credit paid to eligible families that is counted towards the CCDF MOE fund requirement.
- 5. Oregon Food Bank (OFB) is the coordinating agency for a statewide network of 21 Regional Food Banks providing food and resources to food-insecure communities throughout Oregon and Clark County, Washington. The total State MOE claimed from Oregon Food Bank is based on the value of purchased and donated food and the value of donated volunteer time at OFB's four branches and fifteen participating Regional Food Banks that are members of the OFB network. Expenditures counted towards State MOE are limited to expenditures on behalf of families with at least one child who report income below 185 percent of the FPL.

- 6. Oregon Family Independence Initiative (FII) is a platform for social and economic mobility for low-income families. Oregon FII provides families with opportunities to strengthen their social capital, their networks, the ties with their children and their community connections. Families track their adult-specific and child-specific goals through completing journals in an online platform. Participating families may receive incentive payments for a combined total of up to \$800. Oregon FII is funded through a combination of TANF federal funds and non-MOE funds. TANF federal funding is used to fund services for eligible families with income under 350 percent of the FPL and with children under 18 who are living with a caretaker relative. Families who do not meet this criteria are funded with non-MOE funds.
- 7. DHS and the Oregon Parenting Education Collaboration (OPEC) have partnered in a twoyear initial pilot to coordinate and provide evidence-based parent education programs to DHS families, including foster families, with school-age children in their care. The pilot locations work closely with Oregon State University under OPEC's existing infrastructure to participate in required professional development and to collect data needed to evaluate and ensure quality of programs. State MOE funding is used for eligible families with income under 250 percent of the FPL and with children under 18 who are living with a caretaker relative. Families who do not meet this criteria are funded through the current foundation funding stream.
- 8. The YMCA of Marion and Polk county through a pilot project will increase availability of after-school programs offered to TANF-eligible families in nine local elementary and preschool sites throughout the region. The students will be supported by STEM (science, technology, engineering and math), reading, healthy living and recreational opportunities as well as homework assistance. The expected outcomes from the pilot project will be increased enrollment in school, improved attendance, increased exposure to positive youth development programming and increased learning as a result of the additional supports provided by the implemented programs. State MOE funding is used for eligible families with income under 250 percent of the FPL and with children under 18 who are living with a caretaker relative. Families who do not meet this criteria are funded by private pay and scholarship awards.

#### **TANF** Certifications

States that include TANF in the Combined State Plan must provide a certification by the chief executive officer of that State, that during the fiscal year, the State will:

The State Plan must include	Include
1. Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act);	Yes
2. Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the State will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under the State Plan under title XIX. (section 402(a)(3) of the Social Security Act);	Yes
3. Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and privatesector organizations (section 402(a)(4) of the Social SecurityAct)—	
3. (A) have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and	Yes
3. (B) have had at least 45 days to submit comments on the plan and the design of such services;	Yes
4. Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable	Yes

The State Plan must include	Include
access to assistance under the State program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act);	
5. Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act);	Yes
6. (optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).—	
6.i. screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;	Yes
6.ii. refer such individuals to counseling and supportive services; and	Yes
6.iii. waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence.	Yes

#### Employment and Training Programs Under the Supplemental Nutrition Assistance Program (Programs Authorized Under Section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))

#### a. General Requirements [27]

The State agency must prepare and submit an Employment and Training (E&T) Plan to its appropriate Food and Nutrition Service (FNS) Regional Office. The E&T Plan must be available for public inspection at the State agency headquarters. A State agency may include its plan for the SNAP E&T program in a Combined Plan under WIOA but will require FNS approval prior to implementation and must continue to make a copy of the plan available for public inspection. If a State includes SNAP E&T in a Combined Plan under WIOA, the State agency will detail the following for each year covered by the Combined Plan:

[27] 7 CFR § 273.7(c)(6)

1. The nature of the E&T components the State agency plans to offer and the reasons for such components, including cost information. The methodology for State agency reimbursement for education components must be specifically addressed;

Components are activities, services, or outside programs that assist SNAP recipients gain experience, training and skills to increase their likelihood of finding employment and becoming self-

sufficient. Participants may engage in more than one component, either simultaneously or after completion of a component.

Components offered in the E&T program for the State of Oregon are listed below. Following the component, a dollar amount is shown; this is the anticipated monthly cost for each component.

- Supervised Job Search: \$955,654.84
- Job Search Training: \$1,058,541.87
- Job Retention: \$293,940.33
- Basic Education/Foundational Skills Instruction: \$12,866.69
- Career/Technical Education or other Vocational Training: \$651,856.63
- English Language Acquisition: \$82,164.92
- Integrated Education and Training/Bridge Program: \$73,187.37
- Work Readiness: \$56,949.23
- Self-Employment Training: \$5,196.21
- On-the-job Training: \$2,389.53
- Pre-Apprenticeship/Apprenticeship: \$91,216.58
- Internship: \$34,480.02
- Work Experience: \$143,390.45
- WorkFare: \$9,012.66

Anticipated monthly cost (total for all components): \$3,470,847.33

Annual cost (total for all components): \$41,650,167.96

The Food and Nutrition Act of 2008 prohibits State agencies from supplanting State education costs with Federal E&T funds. Only educational components that establish a direct link to job-readiness will be approved, although programs that involved articulated career pathways or stackable credentials that ultimately lead to employment are encouraged.

Oregon's E&T funds will only be used for education/training if:

- Federal funds are not used to supplant other funding;
- The provider and/or individual has attempted to secure federal assistance (not including loans) such as the Pell Grant, and such funds are not available; and
- The education costs are associated with E&T program engagement.

Oregon will not authorize expenses for operating educational/training components that exceed the normal costs of services provided to persons *not participating* in SNAP E&T programs and educational expenses will not be paid for training/education that is normally available to the public at no cost.

STEP providers use iMatchSkills, this system is able to identify which service components a participant is engaged in, preventing the duplication of services.

The maximum support service amount is determined by the provider, based on the participant's needs and provider resources. Each provider is required to submit their support service calculations

as a part of their STEP proposal application. The support services will be in alignment with the support service matrix provided by FNS.

2. An operating budget for the Federal fiscal year with an estimate of the cost of operation for each Federal fiscal year covered by the Combined Plan. Any State agency that requests 50 percent Federal reimbursement for State agency E&T administrative costs, other than for participant reimbursements, must include in its plan, or amendments to its plan, an itemized list of all activities and costs for which those Federal funds will be claimed, including the costs for case management and casework to facilitate the transition from economic dependency to self-sufficiency through work. Costs in excess of the Federal grant will be allowed only with the prior approval of FNS and must be adequately documented to assure that they are necessary, reasonable and properly allocated. A State must submit a plan amendment to request budget adjustments at least 30 days prior to planned implementation;

TOTAL		\$3,009,419.72	\$993,100.00	\$4,002,519.72	
	pantries, and other providers as determined	_			
	Oregon Food Bank,	\$108,152.00	\$0	\$108,152.00	>1%
Employment Department	-				
Oregon	E&T Services	\$2,901,267.72	\$993,100.00	\$3,894,367.72	8%
ABAWD Partner/ Provider	Nature of Contract	Total Admin Costs	Total Participant Reimbursement Costs	Total Cost	% of Total Budget

		Total Admin Costs	Total Participant Reimbursement Costs	Total Cost	% of Total Budget
Baker County School	E&T	\$237,588.87	\$10,347.50	\$247,936.37	>1%
District (Baker Technical	Services				
Institute)	_				

STEP Partner/	Nature of	Total Admin	Total Participant	Total Cost	% of
Provider	Contract	Costs	Reimbursement Costs		Total Budget
Central City Concern	E&T Services	\$946,598.24	\$58,875.00	\$1,005,473.24	2%
Centro Cultural De Condado De Washington	E&T Services	\$155,380.00	\$29,075.00	\$184,455.00	>1%
Clackamas County Children, Family & Community Connections	E&T Services	\$69,140.30	\$10,498.00	\$79,638.30	>1%
Clackamas Workforce Partnerships	E&T Services	\$47,158.00	\$2,700.00	\$49,858.00	>1%
Community College Consortium	E&T Services	\$3,707,701.19	\$320,050.50	\$4,027,751.69	8%
Community Services Consortium	E&T Services	\$564,437.50	\$35,562.50	\$600,000.00	1%
Dress for Success PDX	E&T Services	\$334,917.73	\$267,410.00	\$602,327.73	1%
Dress for Success Salem*	E&T Services	\$228,235.77	\$229,610.00	\$457,845.77	1%
FOOD for Lane County	E&T Services	\$48,021.31	\$3,120.00	\$51,141.31	>1%
Goodwill Industries – Lane County	E&T Services	\$144,602.58	\$17,400.00	\$162,002.58	>1%
Goodwill Industries – South Coast	E&T Services	\$36,613.59	\$6,200.00	\$42,813.59	>1%
Home Plate	E&T Services	\$77,646.43	\$5,133.00	\$82,779.43	>1%
Klamath Works	E&T Services	\$380,865.00	\$19,135.00	\$400,000.00	1%
Lane County Health & Human Services	E&T Services	\$134,503.90	\$44,580.00	\$179,083.90	>1%
Leadership Lab	E&T Services	\$167,566.58	\$51,075.00	\$218,641.58	>1%
Maslow	E&T Services	\$49,054.28	\$23,437.50	\$72,491.78	>1%
New Avenues For Youth	E&T Services	\$142,949.33	\$0.00	\$142,949.33	>1%
OED – STEP	E&T Services	\$8,523,665.27	\$1,000,000.00	\$9,523,665.27	19%
Outside In	E&T Services	\$241,142.36	\$0.00	\$241,142.36	>1%

STEP Partner/	Nature of Contract	Total Admin Costs	Total Participant Reimbursement	Total Cost	% of Total
Provider		CUSIS	Costs		Budget
Portland State	E&T	\$86,927.69	\$51,575.00	\$138,502.69	>1%
University	Services	_			
Southern Oregon Goodwill – Douglas	E&T Services	\$23,750.00	\$17,840.00	\$41,590.00	>1%
County	Services	_			
Southern Oregon	E&T	\$23,750.00	\$21,239.00	\$44,989.00	>1%
Goodwill – Klamath <u>County</u>	Services	_			
Southern Oregon	E&T	\$84,700.58	\$29,775.00	\$114,475.58	>1%
Goodwill – Josephine and Jackson Counties	Services				
Sparrow Furniture	E&T	\$198,051.13	\$1,960.00	\$200,011.13	>1%
	Services	_			
Stone Soup	E&T	\$190,254.00	\$12,900.00	\$203,154.00	>1%
	Services	-			
WSI (includes	E&T	\$1,541,870.43	\$0.00	\$1,541,870.43	3%
subcontractors)	Services	-			
WSI – Oregon Work	E&T Services	\$267,604.50	\$0.00	\$267,604.50	1%
Experience	Services	_			
Youth Development Coalition of Lincoln	E&T Services	\$31,146.15	\$7,905.00	\$39,051.15	>1%
County	Services	_			
TOTAL		\$18,685,842.71	\$2,277,403.00	\$20,963,245.71	

3. The categories and types of individuals the State agency intends to exempt from E&T participation, the estimated percentage of work registrants the State agency plans to exempt, and the frequency with which the State agency plans to reevaluate the validity of its exemptions;

Categories / types of individuals the State agency intends to exempt from E&T participation:

- Caring for a child under age 6 in the filing group
- Student (at least half-time)
- Unable to work due to mental or physical condition
- Working 30 hours per week
- Self-Employed 30 hours per week
- Participating in Drug or Alcohol treatment program
- Participating in TANF JOBS

- Caring for an incapacitated person
- Receiving Unemployment Insurance

Anticipated percentage of work registrants the State agency plans to exempt: 49%

The state agency plans to reevaluate the validity of its exemptions by performing Quality Control random case sample reviews each month.

## 4. The characteristics of the population the State agency intends to place in E&T;

During the SNAP eligibility intake, DHS staff have conversations with SNAP recipients, determining the recipient's employment goals and interest in volunteering in a SNAP E&T program. For ABAWD participants living in counties subject to the time limits (who do not meet an exemption), the conversation will determine if the participant is working for pay or unpaid work. If either is the case, then the Benefit and Eligibility Worker (BEW) will inform the ABAWD of verification requirements for these activities. If they are not meeting enough hours to fulfill the work requirements, they are referred to their local DHS designated provider for E&T services, which is OED. The BEW will also calculate the Fair Labor Standards Act (FLSA) hours for Workfare. Every ABAWD will have this calculation done, that way if the participant chooses to engage in this component to meet ABAWD work requirements, OED will have that information. The BEW will use iMatchSkills to schedule the 1:1 orientation (the participant selects which OED location and date/time works best for them), list potential workfare hours, number of hours needed to meet work activity hours, and provide OED with participant contact information.

For all adults, or 16 to 17-year-old head of households, who are SNAP eligible and living in currently waived counties, or meet an ABAWD exemption, DHS staff will refer the participant to the appropriate E&T services if they indicate an interest in volunteering for a component in either the STEP program.

E&T providers complete an assessment with each participant and work with the participant to place them in a component(s) that should lead to employment. Participants enter and take part in work components based on their skills and work history.

Local outreach materials are being developed to share with all SNAP participants to ensure that they are informed of available resources of all local E&T programs.

### 5. The estimated number of volunteers the State agency expects to place in E&T;

Oregon has two types of voluntary SNAP E&T programs: STEP and the ABAWD program. There are no mandatory programs in Oregon. All individuals who participate in E&T programs do so voluntarily. In Oregon, there are 445,407 SNAP recipients (total case persons, all ages) and of those, 94,914 were new Work Registrants in FFY 2019.

## 6. The geographic areas covered and not covered by the E&T Plan and why, and the type and location of services to be offered;

All SNAP 50/50 services are available statewide and ABAWD services are available in all non-waiver counties.

SNAP 50/50 providers often offer the full array of service components; however, this can vary by location. All ABAWD components are offered in non-waivered counties.

## 7. The method the State agency uses to count all work registrants as of the first day of the new fiscal year;

Work registrant data is pulled from caseload data and the unduplicated number of participants are counted.

### 8. The method the State agency uses to report work registrant information on the quarterly Form FNS–583;

The work registrant information is pulled from the caseload data as well as a data transfer from the Oregon Employment Department (which is our state-wide ABAWD provider). The information is then compiled into the quarterly form FNS-583.

9. The method the State agency uses to prevent work registrants from being counted twice within a Federal fiscal year. If the State agency universally work registers all SNAP applicants, this method must specify how the State agency excludes those exempt from work registration under 7 C.F.R. §273.7(b)(1). If the State agency work registers nonexempt participants whenever a new application is submitted, this method must also specify how the State agency excludes those participants who may have already been registered within the past 12 months as specified under 7 C.F.R. §273.7(a)(1)(i);

The count is unduplicated as Oregon uses a participant's Social Security Number (SSN) as an internal case number to eliminate duplicate work registration over the course of any given year. Oregon designed the Food Stamp Management Information System (FSMIS) so a household member's SSN must be unique. If the SSN is already on the system, the system will not add the person. At the time of application, the worker assigns participants without an SSN a temporary number. The workers monitor participants with temporary SSNs (through reports) so correct numbers are added to the computer as soon as possible.

FSMIS is designed to track all participants who are work registrants each month. The system counts monthly only those household members who are new work registrants for that month. The monthly count is done by keeping track of the date of the next required certification period. The integrity of the system ensuring Social Security Numbers and work registrant counts are unduplicated is reliable.

Further, Oregon has an automated system that allows the state to capture the work registrant count effective October 31 of each year. This allows DHS to capture the data consistently year after year (consistent point of time). This date was selected because it is the end of the first month in the fiscal year and to get the most accurate data. Oregon pulls this information from the end of month run to identify all the work registrants as of October first. These systems were in effect when the first E&T plan became operational. Oregon utilizes the FSMIS system, which is a legacy system to collect this data along with the TRACS system which is also manually coded by workers.

10. The organizational relationship between the units responsible for certification and the units operating the E&T components, including units of the Statewide workforce

#### development system, if available. FNS is specifically concerned that the lines of communication be efficient and that noncompliance by the participant be reported to the certification unit within 10 working days after the noncompliance occurs;

The local E&T provider is the operating agency responsible for:

- Providing eligible SNAP participants who volunteer to participate in a SNAP E&T program with one or more service components (listed below in *Services Offered*);
- Conducting assessments, developing case plans, and providing case management;
- Providing support and technical assistance to SNAP E&T participants;
- Issuing support service payments (where applicable);
- Monitoring participant compliance, tracking, and attendance (ABAWD program);
- Establishing and monitoring job sites and job site assignments;
- Assessing and identifying which household members are appropriate for workfare and informing them about the program (non-exempt ABAWDS in non-waived counties);
- Referring eligible recipients to other appropriate E&T providers;
- Maintaining program, fiscal and accountable records, retention of records; and
- Fulfilling reporting requirements.

Oregon DHS responsibilities include:

- Determining SNAP eligibility
- Informing households and E&T providers of a SNAP participant's eligibility for SNAP E&T services;
- Calculating FLSA hours for workfare (ABAWD program);
- Verification of paid and non-paid work for ABAWDS;
- Final determination on good cause;
- Determination of counting months and sending appropriate notifications for non-exempt ABAWDS in non-waived counties;
- Monitoring compliance, including conducting management evaluations; and
- Compiling and submitting quarterly and annual reports to Food and Nutrition Service (FNS).

Each month, statistics are gathered from Oregon's data system, iMatchSkills, and provider quarterly data outcome reports. The counts cover the number of new registrants, new exemptions and individuals disqualified. The information is used to prepare the quarterly FNS-583. Each quarter these statistics are combined and sent to FNS. Also, it's anticipated that in FFY 2020, the iMatchSkills system will be updated with all required data points. With this update, contracted partners will no longer be required to provide outcome reports.

As of April 2018, SSP E&T programs, in conjunction with OED, successfully implemented OED's tracking software, iMatchSkills, for use by every STEP provider. It enables each STEP provider to verify SNAP eligibility upon registration of the participant. Further, it identifies whether a participant is

ABAWD, non-ABWAD, or ABAWD exempt. OED is continuing to develop the functionality of the iMatchSkills software to serve as a database which will track service components, ongoing case management, and outcomes for both the ABAWD and STEP programs. IMatchSkills tracks participant attendance and case plans. OED will be able to run outcome reports for DHS using the data and their wage matching capabilities (Unemployment Insurance System) to show more accurate numbers for placements, wage gain, and job retention.

Although DHS gathers information on outcomes from the providers directly, we are working towards expansion of iMatchSkills reporting functionality so that this can also be produced by using DHS systems and through a data sharing agreement with OED. OED is working towards matching DHS submitted participant data against the wage file to measure placements, wage gain, and job retention, as well as show demographic information.

# 11. The relationship between the State agency and other organizations it plans to coordinate with for the provision of services, including organizations in the Statewide workforce development system, if available. Copies of contracts must be available for inspection;

The workforce development system in Oregon is comprised of the Higher Education Coordinating Commission (HECC) (Title II), nine (9) Workforce Boards (Title 1), OED (Title III), the Department of Human Services Vocational Rehabilitation Program (VR) (Title IV), SSP, and various non-profit organizations and local governments.

- HECC delivers Adult Basic Education (ABS) in the form of literacy, numeracy, English as a Second Language (ESL), and General Equivalency Diploma (GED) classes. HECC also operates the community college system in Oregon.
- The 9 Workforce Boards use their funding to provide job search assistance and occupational training to job seekers.
- OED operates the state's labor exchange, offering free job screening and referrals, job search assistance in the form of resources, classes, as well as offering employer services such as free job listing services, interviewing space, and incentive programs such as the Work Opportunity Tax Credit (WOTC).
- VR offers occupational training and job finding assistance to people with disabilities.
- SSP helps low income people by providing E&T programs for those receiving Temporary Assistance for Needy Families (TANF), SNAP, Employment Related Day Care (ERDC), and Refugee benefits.
  - TANF uses the Job Opportunity and Basic Skills (JOBS) program to help those that are near job ready to work on job finding skills and occupational training. It offers unpaid work experiences and a subsidized wage program to help participants gain skills, experience, and to incentivize employers to hire participants upon completion.
  - o SNAP has two E&T programs: ABAWD and STEP.
  - ERDC is available to low-income working people to assist them with child care costs so that they can keep working. ERDC is family-focused and an effort to help people with job retention and family stability.
  - The Refugee Program is similar to TANF JOBS, but is focused on people who have recently resettled. The program focuses on ESL, cultural training, housing assistance, job search skills, and occupational training.

All Workforce Development agencies in Oregon collaborate to prevent the unnecessary duplication of services and to better coordinate services and braid funding to enable SNAP participants to have access to multiple services. Local leadership committees meet once per month in each workforce area to discuss ongoing processes, coordination, and changes. The four core partners of WIOA are present, along with SSP. This helps to keep managers aware of other services, such as access to VR counseling and training for SNAP participants, Trade Act and Training Unemployment Insurance programs, upcoming changes to training available from the workforce boards, and changes to the community college services. At the state level, there are committees and workgroups that focus on increasing pathways to training programs for low-income people. In addition, the Deputy Directors of the HECC, OED, VR, and SSP work closely together to coordinate efforts.

## 12. The availability, if appropriate, of E&T programs for Indians living on reservations after the State agency has consulted in good faith with appropriate tribal organizations;

Oregon has been expanding SNAP E&T services which will help to ensure that there will be more access and opportunities for SNAP recipients across the state, including tribal members. A current STEP partner has expressed interest in expanding services to address tribal needs specifically.

E&T Partner:	Indian	Consult:	Actions:	
	Reservation:	_		
COIC: (Klamath and Lake Counties)	The Klamath Tribes	No	The Klamath Tribes operate their own TANF program that serves Klamath Tribal members who reside in the service area of Klamath County. Tribal members who are not eligible for TANF through the Tribe may apply for TANF at a DHS office. Klamath tribal members receive SNAP through DHS.	
Confederated Tribes of Siletz, serving Benton, Clackamas, Lane, Lincoln, Linn, Marion, Polk, Tillamook, Washington, and Yamhill Counties	Confederated Tribes of Siletz Indians	_	Confederated Tribes of Siletz Indians operates their own TANF program and provides their own employment and training services to tribal members. Tribal members who are not eligible for TANF through the Tribe may apply for TANF at a DHS office. Tribal members receive SNAP through DHS	

The following chart describes Oregon's current tribal engagement.

13. If a conciliation process is planned, the procedures that will be used when an individual fails to comply with an E&T program requirement. Include the length of the conciliation period; and

ABAWD: While the Oregon ABAWD program is voluntary, conciliation is an opportunity for nonexempt ABAWDS in counties subject to the time limits to establish good cause for non-cooperation with SNAP work requirements. It can also be used to resolve disputes and misunderstandings.

Conciliation can be requested by the participant, DHS, or the provider. It includes:

- Informing participants of their Employment and Training rights and responsibilities and counting months;
- Exploring whether good cause exists for noncompliance; and

• Changing the ABAWD's case plan, if needed.

Non-exempt ABAWDS in counties subject to time limits may be asked to provide evidence to establish whether their reasons for not meeting the work requirements are acceptable.

#### STEP: Not applicable, as it is a voluntary program and non-participation does not affect benefits.

## 14. The payment rates for child care established in accordance with the Child Care and Development Block Grant provisions of 45 CFR 98.43, and based on local market rate surveys.

The average monthly cost per child for the Employment Related Day Care program is \$408. The average monthly parent co-pay is \$223. The minimum monthly parent co-pay is \$27.

15. The combined (Federal/State) State agency reimbursement rate for transportation costs and other expenses reasonably necessary and directly related to participation incurred by E&T participants. If the State agency proposes to provide different reimbursement amounts to account for varying levels of expenses, for instance for greater or lesser costs of transportation in different areas of the State, it must include them here.

Support service payments: Support service payments are authorized by the department or provider to reimburse a participant's cost for program participation. Support services must be determined to be reasonable and necessary to participate in the E&T program and may include such categories as transportation, clothing, materials, tools, books, training fees, and certificates or test fees.

ABAWD Program: Each month, participants may receive support services if they have complied with program requirements. These support services will cover participants' costs in the program. The support services will be in alignment with the support service matrix provided by FNS.

STEP: The maximum support service amount is determined by the provider, based on the participant's needs and provider resources. Each provider is required to submit their support service calculations as a part of their STEP proposal application. The support services will be in alignment with the support service matrix provided by FNS.

Method of Reimbursement: Upfront reimbursements within program funding constraints.

Procedure for Reimbursement: The general method used for E&T reimbursement is to pay participants up-front for expenses that will be incurred. These up-front expenses include transportation and other costs such as clothing for interviews, haircuts, testing fees, textbooks, and other employment-related expenses. The majority of the reimbursements are vendor payments such as gas cards or vouchers, bus tickets, and clothing vouchers. Agencies in their contracts with DHS also agree to reimburse participants for training and education-related expenses such as uniforms, personal safety items, other necessary equipment, and books and training manuals. Participants may be reimbursed for expenses such as licenses or fees that are required for a specific work component offered by the agency. For E&T participants, the reimbursement will be made from of the funding for support services.

Procedural steps include:

- A participant makes a need known to the provider;
- The provider and the participant establish estimated costs within program constraints;
- A payment method is selected (voucher, local transportation pass, gas card, etc.) and the amount is issued;
- The provider enters documentation and data to support the payment.

# 16. Information about expenses the State agency proposes to reimburse. FNS must be afforded the opportunity to review and comment on the proposed reimbursements before they are implemented.

The general method used for E&T reimbursement is to pay participants up-front for expenses that will be incurred. These up-front expenses include transportation and other costs such as clothing for interviews, haircuts, testing fees, textbooks, and other employment-related expenses. The majority of the reimbursements are vendor payments such as gas cards or vouchers, bus tickets, and clothing vouchers. Agencies in their contracts with DHS also agree to reimburse participants for training and education-related expenses such as uniforms, personal safety items, other necessary equipment, and books and training manuals. Participants may be reimbursed for expenses such as licenses or fees that are required for a specific work component offered by the agency. For E&T participants, the reimbursement will be made from of the funding for support services.

## b. Able-bodied Adults without Dependents (ABAWD)[28]

 A State agency interested in receiving additional funding for serving able-bodied adults without dependents (ABAWDs) subject to the 3- month time limit, in accordance with 7 C.F.R. §273.7(d)(3), must include the following for each Federal fiscal year covered by the Combined Plan under WIOA:

[28] 7 CFR § 273.7(c)(7)

## 1. Its pledge to offer a qualifying activity to all at-risk ABAWD applicants and recipients;

Oregon pledges to offer a qualifying activity to each at-risk ABAWD applicant or recipient (not exempted or in a waived county) beginning with the first complete month of eligibility. Non-exempt and non-waived ABAWDS are not eligible to receive SNAP benefits for more than three months in a 36-month period unless the individual meets the work requirement.

Oregon has elected to have a statewide contract for ABAWD services. OED has been selected to be this provider. This will ensure consistent and qualifying services are provided to all at-risk ABAWDS. Due to limited funding provided through the ABAWD Pledge funds, contracting with OED allows for leveraging of services provided as part of the STEP contracts.

The qualifying services provided by OED, while consistent with the services provided to the general population, will be at an enhanced or expanded capacity for the at-risk ABAWDS. There will be individualized services provided to guide the ABAWD from one activity to the next. There will also be case management provided to ensure progression and that they are meeting the work activity requirements. Regulations at 7 CFR 273.24(a) provide that fulfilling the work requirement means:

Working 20 hours or more per week, averaged monthly to 80 hours;

- Participating in and complying with the requirements of a work program for 20 hours a week or more;
- Any combination of working and participating in a work program for a total of 20 hours per week; or
- Participating in and complying with the requirements of a workfare program.

Workfare is an E&T component for ABAWDS (non-exempt and living in non-waived county) to fulfill their work requirement to continue receiving their SNAP benefits beyond the three countable months in thirty-six months. The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value in their community.

Workfare hourly requirements are determined by utilizing the Fair Labor Standards Act (FLSA) and are equivalent to household benefits divided by the Oregon minimum wage. Oregon has three official minimum wage tiers, administered based on geographic areas. DHS has devised a calculator for each county based on the minimum wage tier that it falls into. This ensures that participants do not exceed the number of hours that are equivalent to their benefits divided by the official Oregon minimum wage for their geographic area. Information about Oregon's minimum wage system is available at this link: http://www.oregon.gov/boli/WHD/OMW/Pages/Minimum-Wage-Rate-Summary.aspx

As allowed by 7 CFR §273.7 and §273.24, services from other sources will count toward SNAP E&T work requirements. Other sources include:

- Work services under Workforce Innovation and Opportunity Act (WIOA); and
- Work services under the Trade Adjustment Assistance (TAA).

For FFY 2020, Oregon will comply with the commitment to offer either a qualifying education, training, or workfare opportunity to every ABAWD participant (not exempted or living in a waived county) beginning with the first complete month allowing the state to receive a portion of the \$20 million used to reimburse state agencies for costs incurred in serving ABAWDS.

Oregon is seeking additional funding for costs incurred in serving ABAWDS subject to the threemonth time limit. We anticipate that many participants will be enrolled simultaneously in more than one activity and participate for more than one month. To support participants, transportation and other necessary and related support service costs will be available to ABAWDS every month they are enrolled and participating in a component activity.

Oregon estimates spending approximately \$468.98 monthly for each non-exempt ABAWD in non-waived counties which translates to approximately \$3,894,367.72.

The additional funding is needed to ensure that qualifying work activities are offered.

For FFY 2020, Oregon will continue to provide structured components to ABAWDS through referral to OED. OED will work with the participant to utilize the array of E&T providers for ABAWD's to meet their work-related activities requirements.

Components for these areas are as follows:

- Supervised Job Search
- Job Search Training
- Job Retention
- Basic Education/Foundational Skills Instruction

- Career/Technical Education or other Vocational Training
- English Language Acquisition
- Integrated Education and Training/Bridge Program
- Work Readiness
- Self-Employment Training
- On-the-job Training
- Pre-Apprenticeship/Apprenticeship
- Internship
- Work Experience

#### Supervised Job Search:

Description: Participants who are work ready (as determined by assessment), recently unemployed, or need assistance with job search will be referred to this component. Supervised job search must have a case plan that includes oversight, tracking, review, and assessment, as well as providing regular, or at least one time per month, check-ins or meetings to report on the job search progress or to adjust the case plan. All services must be provided in a state approved location.

ABAWDS (non-exempt and those in non-waived counties): Supervised Job Search activities cannot exceed nine hours per week and must be combined with other work-related activities to equal twenty hours per week. However, if the ABAWD is participating in job search through a WIOA program/activities or in the 30 days prior to the start of workfare, they can exceed 9 hours per weekly. Participants will submit their job contact forms to OED weekly for tracking participation.

STEP: Supervised Job Search activities within this program vary, depending upon the targeted audience and provider.

Reporting Measure(s) if >100 participants per year:

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers		Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Central City	Multnomah	SNAP recipients who are	60	\$28,398.00
Concern		homeless or formerly homeless		· · / · · · · ·
Dress for Success	Portland Metro	Female SNAP recipients	50	\$59,700.79
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	38	\$9,291.71
Outside In	Multnomah County	SNAP Recipients-Homeless Youth	15	\$577.45
Portland State	Portland Metro	SNAP Recipients-Students	10	\$1,448.80
University		enrolled full time or part time		
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	3	\$3,170.90
Dress for Success	Salem Metro	Female SNAP recipients	41	\$20,921.62
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	30	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	2	\$571.00
Goodwill	Lane County	Veterans, disadvantaged and	208	\$17,839.48
Industries-Lane County		disabled SNAP recipients	-	
Lane County Health and Human Services	Lane County	SNAP recipients who are unstably housed or homeless	13	\$6,052.68
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	9	\$1,741.66
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	32	\$5,072.00
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	18	\$8,328.89
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	2	\$2,919.90

	Klamath County	Veterans, disadvantaged and	11	\$1,979.17
Oregon Goodwill		disabled SNAP recipients	-	
Klamath Works, Inc.	Lake and Klamath County	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	31	\$15,869.33
Institute	Crook, Deschutes, Jefferson, Baker, Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	4	\$2,771.87
· ·	Clackamas, Multnomah, Marion, Washington	SNAP Recipients-Underserved youth	15	\$2,513.50
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	36	\$6,508.06
Home Plate	Washington County	SNAP recipients-Homeless Youth	6	\$1,294.11
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	304	\$93,708.92
Oregon Employment Department- STEP	Statewide	SNAP Recipients	993	\$635,900.00
Community College Consortia	Throughout state	SNAP Recipients	44	\$19,667.71

#### Job Search Training:

Description: A component that strives to enhance the job search skills of participants by providing instruction in job seeking techniques and increasing motivation and self–confidence. The component may consist of job skills assessments, job placement services, or other direct training or support activities. Other activities may include resume writing workshops and learning how to use online job search tools. The job search training component may combine job search activities with other training and support activities.

ABAWD: Job Search Training may include resume writing workshops, interviewing workshops, and more training related to Job Search. Job Search Training activities cannot exceed nine hours per week and must be combined with other work-related activities to equal twenty hours per week unless the ABAWD is participating through a WIOA program.

STEP: Job Search Training activities within this program vary, depending upon the targeted audience and providers.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Central City Concern	Multnomah County, Clackamas County	SNAP recipients who are homeless or formerly homeless	70	\$28,397.60
Dress for Success	Portland Metro	Female SNAP recipients	10	\$13,954.91
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	9	\$2,144.24
Outside In	Multnomah County	SNAP Recipients- Homeless Youth	20	\$975.50
Portland State University	Portland Metro	SNAP Recipients-Students enrolled full time or part time	10	\$1,448.80
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	36	\$3,170.90
Dress for Success	Salem Metro	Female SNAP recipients	9	\$9,509.82
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	15	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	4	\$1,816.86
Goodwill Industries-Lane County	Lane County	Veterans, disadvantaged and disabled SNAP recipients	60	\$5,146.00
Lane County Health and Human Services	Lane County	SNAP recipients who are unstably housed or homeless	8	\$3,362.60
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	4	\$634.00
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	1	\$1,751.94

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Klamath Works, Inc.	Lake and Klamath County	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	15	\$12,060.70
Baker Technical	Crook, Deschutes,	SNAP Recipients	4	\$2,771.87
Institute	Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	· · · ·		
Leadership Lab	Clackamas, Multnomah, Marion, Washington	SNAP Recipients- Underserved youth	15	\$11,450.40
Clackamas	Clackamas County	SNAP Recipients	7	\$8,642.54
County Children, Family & Community Connections	-			
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	448	\$138,741.00
Work Systems	Clackamas, Clatsop,	SNAP Recipients	64	\$27,206.46
Inc Oregon Work Experience	Columbia, Tillamook, Linn, Marion, Polk, Yamhill, Multnomah, Washington, Hood River, Wasco, Sherman, Gilliam, Wheeler, Jefferson, Crook, Deschutes, Klamath, Lake, Coos, Douglas, Curry Counties			
Centro Cultural	Washington County	Spanish speaking or	7	\$1,220.26
De Condado De Washington		bilingual SNAP Recipients		
Home Plate	Washington County	SNAP recipients-Homeless Youth	7	\$2,588.21
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	243	\$93,708.90

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Oregon Employment Department- STEP	Statewide	SNAP Recipients	993	\$635,900.00
Community College Consortia	Throughout state	SNAP Recipients	95	\$42,531.07

#### Job Retention:

Description: Services provided to E&T participants who have secured employment after participating in another E&T component, are no longer participating in another E&T component, and are no longer receiving SNAP benefits. This component is meant to help achieve satisfactory performance, retain employment, or to increase earnings over time. The participant may receive up to 90 days of job retention services. The 90 days begins when the SNAP benefits end. If a participant becomes employed and is still receiving SNAP benefits, services must be provided under a component other than retention.

# ABAWD: Offered statewide to assist ABAWDS in retaining employment and increasing earning potential.

*STEP:* Most STEP providers in Oregon offer this component as a part of their program and collaborate with other STEP providers to ensure that the participant is receiving the most comprehensive Job Retention Services.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers		Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
		SNAP recipients who are homeless or formerly homeless	50	\$14,198.97
Dress for Success	Portland Metro	Female SNAP recipients	7	\$7,256.55
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	8	\$1,906.00
Outside In	Multnomah County	SNAP Recipients-Homeless Youth	2	\$737.44
Portland State University		SNAP Recipients-Students enrolled full time or part time	10	\$1,448.80

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Dress for	Salem Metro	Female SNAP recipients	8	\$4,945.11
Success	-			
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	15	\$1,881.46
Youth	Lincoln County	SNAP Recipients- Ages 18-24	10	\$415.28
Development Coalition of Lincoln County	-			
Lane County	Lane County	SNAP recipients who are	6	\$1,569.21
Health and Human Services	-	unstably housed or homeless	-	
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	4	\$1,227.08
Goodwill	Curry and Coos	Veterans, disadvantaged and	8	\$3,811.53
Industries of Lane		disabled SNAP recipients		
&South Coast Counties	-		_	
Maslow	Josephine and	SNAP recipients who are	1	\$1,167.96
	Jackson County	unstably housed or homeless		
Southern Oregon	Klamath County	Veterans, disadvantaged and	5	\$791.67
Goodwill		disabled SNAP recipients	0	<i><i><i>ϕ</i>iϕiqiϕiqiϕiqiqiqiqiq<i></i></i></i>
Klomath Warks	Lake and Klometh		10	¢9.252.00
Klamath Works, Inc.	County	SNAP participants who are transitioning from drug/alcohol	10	\$8,252.00
		treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	_	
Baker Technical	Crook, Deschutes,	SNAP Recipients	2	\$1,187.94
Institute	Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	-		
Leadership Lab	Clackamas, Multnomah, Marion, Washington	SNAP Recipients-Underserved youth	15	\$2,513.50
Clackamas County Children, Family &	Clackamas County	SNAP Recipients	3	\$2,304.68

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Community Connections	_			
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	29	\$40,464.17
Centro Cultural De Condado De Washington*	Washington County	Spanish speaking or bilingual SNAP Recipients	5	\$903.90
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	54	\$46,854.46
Oregon Employment Department- STEP	Statewide	SNAP Recipients	350	\$141,311.09
Community College Consortia	Throughout state	SNAP Recipients	12	\$8,791.53

# **Education Components:**

The Food and Nutrition Act of 2008 prohibits State agencies from supplanting State education costs with Federal E&T funds. Only educational components that establish a direct link to job-readiness will be approved, although programs that involved articulated career pathways or stackable credentials that ultimately lead to employment are encouraged.

Oregon's E&T funds will only be used for education/training if:

- Federal funds are not used to supplant other funding;
- The provider and/or individual has attempted to secure federal assistance (not including loans) such as the Pell Grant, and such funds are not available; and
- The education costs are associated with E&T program engagement.

Oregon will not authorize expenses for operating educational/training components that exceed the normal costs of services provided to persons *not participating* in SNAP E&T programs and educational expenses will not be paid for training/education that is normally available to the public at no cost.

Oregon's providers offer several categories of services within the education component. These are:

- Basic Education/Foundational Skills Instruction
- Career/Technical Education or other Vocational Training

- English Language Acquisition
- Integrated Education and Training/Bridge Program
- Work Readiness

#### **Basic Education / Foundational Skills Instruction:**

Description: Programs that offer academic instruction and education services below the postsecondary level that increase an individual's ability to read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent; transition to postsecondary education and training; and obtain employment. Such programs include Adult Basic Education (ABE), basic literacy, and high school equivalency (GED, TASC, HiSET, or other).

ABAWD: Educational activities are provided when they will directly enhance the participant's employability in a field with anticipated workforce shortages and may include GED testing and preparation, as well as basic literacy classes. This component is available for participants over age 21.

*STEP:* Several STEP providers have basic education components. They offer 1:1 assistance to the participant as they prepare for the ABE/GED required tests. They provide enhanced services in the form of direct tutoring/coaching which is not available to the general public. This component can be completed in conjunction with another component, such as supervised job search.

Reporting Measure(s) if >100 participants per year:

Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T

Providers	Geographic area	homeless, re-entry	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	11	\$2,620.74
Outside In	Multnomah County	SNAP Recipients- Homeless Youth	8	\$1,334.12
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	15	\$4,703.65
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	2	\$467.19
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	5	\$141.17
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	1	\$1,167.96

Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	1	\$1,979.91
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	3	\$451.95
Home Plate	Washington County	SNAP recipients- Homeless Youth	6	\$1,294.11
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	11	\$2,500.00
Oregon Employment Department-STEP	Statewide	SNAP Recipients	100	\$15,917.00
Community College Consortia	Throughout state	SNAP Recipients	160	\$116,644.85

#### Career / Technical Education or Other Vocational Training:

Description: Organized activities at the post-secondary level that provide individuals with the academic and technical knowledge and skills necessary to prepare for further education and for careers in current or emerging employment sectors. Programs are primarily designed for those who are beyond the age of compulsory high school attendance. Ideally, such programs should be employer-driven and could lead to industry-recognized certificates or credentials.

ABAWD: This component is offered depending upon geographic region and available resources. OED refers ABAWD participants to STEP providers offering Career/Technical Education or Other Vocational Training, and will be given support service funding to assist participants in the training costs.

STEP: Several STEP providers provide participants with multiple options for certificate programs such as CNA, Flagging, Pesticide Certification, Master Gardner Certification, Food Handler's training, and Oregon Liquor Control Certification. The participants are coached through their training with enhanced case management.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4th quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Dress for Success	Portland Metro	Female SNAP recipients	8	\$3,907.37

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	4	\$953.00
Outside In	Multnomah County	SNAP Recipients- Homeless Youth	7	\$2,581.03
Portland State University	Portland Metro	SNAP Recipients-Students enrolled full time or part time	44	\$3,622.00
Dress for Success	Salem Metro	Female SNAP recipients	5	\$2,662.75
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	30	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	30	\$778.65
Food for Lane	Lane County	SNAP recipients	16	\$8,003.55
Goodwill Industries-Lane County	Lane County	Veterans, disadvantaged and disabled SNAP recipients	10	\$857.66
Lane County Health and Human Services	Lane County	SNAP recipients who are unstably housed or homeless	2	\$11,432.80
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	2	\$1,227.08
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	2	\$317.00
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	2	\$988.17
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	10	\$1,167.96
Southern Oregon Goodwill	Klamath County	Veterans, disadvantaged and disabled SNAP recipients	2	\$593.75

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Klamath Works, Inc.	Lake and Klamath County	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	7	\$3,173.88
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	5	\$27,718.70
Clackamas County Children, Family & Community Connections	Clackamas County	SNAP Recipients	4	\$576.17
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	43	\$36,257.10
Work Systems Inc Oregon Work Experience	Clackamas, Clatsop, Columbia, Tillamook, Linn, Marion, Polk, Yamhill, Multnomah, Washington, Hood River, Wasco, Sherman, Gilliam, Wheeler, Jefferson, Crook, Deschutes, Klamath, Lake, Coos, Douglas, Curry Counties	SNAP Recipients	41	\$17,394.29
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	44	\$7,954.30
Home Plate	Washington County	SNAP recipients-Homeless Youth	7	\$3,623.50
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	44	\$3,750.00
Oregon Employment	Statewide	SNAP Recipients	400	\$212,222.64

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Department- STEP				
Community College Consortia	Throughout state	SNAP Recipients	396	\$290,685.99

# English Language Acquisition:

Description: A component designed to help English language learners achieve competence in reading, writing, speaking, and comprehension of the English language.

ABAWD: This component is offered depending participant need and availability. Participants attend short-term ELA training as a component of their case plan.

STEP: Oregon's STEP providers work with participants to determine the case plan that will assist with the components needed to gain employment. The STEP providers listed below have an identified ELA program. (Note: Most STEP providers refer participants to needed ESL courses and some have included this in their participant numbers/program costs under Basic Education.)

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re- entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	1	\$362.20
Sparrow Furniture	Salem Metro	SNAP Recipients – resettled refugee and asylees	7	\$3,300.84
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP Recipients	6	\$940.73
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker, Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	3	\$791.96
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	3	\$4,519.49
Home Plate	Washington County	SNAP recipients- Homeless Youth	4	\$258.82
Oregon Employment	Statewide	SNAP Recipients	11	\$1,250.00

Providers	Geographic area	Target audience (e.g., homeless, re- entry population, ABAWDS)		Anticipated monthly cost
Department-				
ABAWD				
Oregon	Statewide	SNAP Recipients	100	\$70,740.88
Employment				
Department-STEP				
Community	Throughout state	SNAP Recipients	71	\$37,890.69
College Consortia				

#### Integrated Education and Training/Bridge Programs:

Description: Programs that provide adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or group of occupations for the purpose of educational and career advancement.

Reporting Measure(s) if >100 participants per year:

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	3	\$724.40
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP Recipients	15	\$14,110.94
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	10	\$415.28
Community College Consortia	Throughout state	SNAP Recipients	54	\$57,936.75

#### Work Readiness Training:

Description: Intensive programs that include skill assessment and educational remediation services that prepare individuals for the workforce. Work readiness skills may include both foundational cognitive skills such as reading for information, applied mathematics, locating information, problem solving, and critical thinking and non-cognitive skills, or soft skills, which are defined as personal characteristics and behavioral skills that enhance an individual's interactions, job performance, and career prospects such as adaptability, integrity, cooperation, and workplace discipline.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Outside In	Multnomah County	SNAP Recipients – Homeless Youth	10	\$3,687.14
Portland State University	Portland Metro	SNAP Recipients	2	\$724.40
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP Recipients	15	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	2	\$415.28
Klamath Works, Inc	Lake and Klamath Counties	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	23	\$22,217.13
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	5	\$1,187.94
Clackamas Workforce Partnership*	Clackamas County	SNAP Recipients	8	\$7,859.67
Leadership Lab	Clackamas, Multnomah, Marion, Washington	SNAP Recipients-Underserved youth	15	\$11,450.38

# Work Components:

- On-the-Job Training (OJT)
- Self-Employment Training
- Pre-Apprenticeships and Apprenticeships
- Internship Programs
- Workfare
- Work Experience

# On-the-Job Training (OJT):

Description: A work placement made through a contract with an employer or registered apprenticeship program sponsor in the public, private non-profit, or private sector. An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's individual employment plan

Reporting Measure(s) if >100 participants per year: N/A

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	5	\$1,448.80
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	3	\$940.73

#### Self-Employment Training:

Description: A component that improves the employability of participants by providing training in setting-up and operating a small business or other self-employment venture.

Reporting Measure(s) if >100 participants per year: N/A	۱
---	---

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	2	\$181.10
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$4,703.65
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	3	\$311.46

#### **Pre-Apprenticeships and Apprenticeships**

**Description:** A combination of on-the-job training and related instruction in which workers learn the practical and theoretical aspects of a skilled occupation. Apprenticeship programs can be sponsored by individual employers, joint employer and labor groups, and/or employer associations. Pre-Apprenticeship programs provide individuals with the basic and technical skills necessary to enter an apprenticeship program and should be directly linked to an apprenticeship program.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Outside In	Multnomah County	SNAP Recipients – Homeless Youth	2	\$97.55
Sparrow Furniture	Salem Metro	SNAP Recipients – resettled refugee and asylees	21	\$29,707.67
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$940.73
Klamath Works, Inc	Counties	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	2	\$1,269.55
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	28	\$35,056.92
Home Plate	Washington County	SNAP recipients-Homeless Youth	3	\$1,294.10
Community College Consortia	Throughout state	SNAP Recipients	17	\$22,850.06

#### Internship:

Description: A planned, structured learning experience that takes place in a workplace for a limited period of time.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	homeless, re-entry	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	10	\$1,448.80
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	3	\$3,170.90

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$9,407.29
Home Plate	Washington County	SNAP recipients- Homeless Youth	3	\$3,588.21
Community College Consortia	Throughout state	SNAP Recipients	35	\$16,864.82

#### Work Experience:

Description:

A work component designed to improve the employability of participants through actual work experience and/or training. Work experience assignments may not replace the employment of a regularly employed individual, and they must provide the same benefits and working conditions provided to regularly employed individuals performing comparable work for comparable hours. It is permissible to place E&T participants in work experience positions with private sector entities. In Oregon, this component is only offered for STEP participants who are non-ABAWD or ABAWD exempt.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Central City	Multnomah County,	SNAP recipients who are	615	\$86,771.30
Concern	Clackamas County	homeless or formerly homeless		
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17- 24)	9	\$6,909.22
Outside In	Multnomah County	SNAP Recipients-Homeless Youth	45	\$5,497.00
Portland State University	Portland Metro	SNAP Recipients	5	\$1,448.80
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	3	\$23,613.00
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$18,814.58
Goodwill Industries of	Lane County	Veterans, disadvantaged and disabled SNAP recipients	3	\$257.30

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Lane &South Coast Counties	-			
	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	6	\$79.25
	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	2	\$7,764.22
Southern Oregon Goodwill	Klamath County	Veterans, disadvantaged and disabled SNAP recipients	1	\$593.75
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	5	\$197.92
	Lake and Klamath Counties	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	15	\$8,252,08
Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	10	\$1,187.94
Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	8	\$6,459.71
Centro Cultural De Condado De Washington		Spanish speaking or bilingual SNAP Recipients	2	\$4,338.71
Community College Consortia	Throughout state	SNAP Recipients	5	\$4,195.47

Workfare (for non-exempt ABAWDS in non-waived counties only)

#### Workfare:

Description: A work component in which SNAP recipients perform work in a public service capacity as a condition of eligibility. In lieu of wages, workfare participants receive compensation in the form of their household's monthly coupon allotment. The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value to the community. Only ABAWD's who reside in non-waived counties may participate in workfare.

Oregon has the sole responsibility of establishing Workfare sites. They must be a private or public non-profit agency serving in a public service capacity.

Oregon is also currently contracting with the Oregon Food Bank (OFB) to provide services across the state. Within the contract, OFB and other Workfare partner sites will have oversight of worksite placements and agreements. OFB will report quarterly on the required outcomes to DHS. In addition, other organizations, in the counties subject to the time limits, have been approved to be included as workfare sites.

OED, as the statewide ABAWD provider, has data sharing agreements and an MOU with all approved Workfare partners. They are responsible for referring ABAWD participants to their sites.

DHS will determine the workfare hours. In Oregon, the maximum number of hours that are required (and allowed) of an ABAWD each month is determined by dividing the household's SNAP benefit allotment by the State minimum wage. This is then divided by four to get the maximum weekly hours, rounding down if needed. As of 7/1/17, we have three official State minimum wage tiers. Link to Oregon wage rate information: http://www.oregon.gov/boli/WHD/OMW/Pages/Minimum-Wage-Rate-Summary.aspx

FLSA is calculated by using the minimum wage where the workfare position is performed. If a participant meets the FLSA level of participation in workfare, they do not need to participate in other activities to continue getting their SNAP benefits beyond three months.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Benton Habitat for Humanity	Benton County	ABAWDS	10	\$0.00
Bethlehem House of Bread*	Washington County	ABAWDS	TBD	\$0.00
Catholic Community Charities*	Marion County	ABAWDS	20	\$0.00
Clackamas Service Center*	Clackamas County	ABAWDS	8	\$0.00
Clay Street Table*	Multnomah	ABAWDS	6	\$0.00
EMO NE Emergency Food Program*	Multnomah	ABAWDS	6	\$0.00

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Forest Grove Assembly of God Church*	Washington County	ABAWDS	3	\$0.00
Good Roots Community Church Food Pantry*	Clackamas County	ABAWDS	4	\$0.00
HOPE First Baptist Church Food Pantry*	Clackamas County	ABAWDS	TBD	\$0.00
Marion Polk Food Share*	Marion County	ABAWDS	10	\$0.00
Neighborhood House Food Pantry*	Multnomah	ABAWDS	20	\$0
Oregon Food Bank	Multnomah and Washington Counties	ABAWDS	50	\$9,012.66
SnowCap Community Charities*	Multnomah	ABAWDS	4	\$0
Tualatin Schoolhouse Pantry*	Washington County	ABAWDS	3	\$0.00
Wilsonville Community Sharing*	Clackamas County	ABAWDS	5	\$0.00

\*Affiliate of Oregon Food Bank

# 2. Estimated costs of fulfilling its pledge;

Oregon pledges to offer a qualifying activity to each at-risk ABAWD applicant or recipient (not exempted or in a waived county) beginning with the first complete month of eligibility. Non-exempt and non-waived ABAWDS are not eligible to receive SNAP benefits for more than three months in a 36-month period unless the individual meets the work requirement.

Oregon has elected to have a statewide contract for ABAWD services. OED has been selected to be this provider. This will ensure consistent and qualifying services are provided to all at-risk ABAWDS. Due to limited funding provided through the ABAWD Pledge funds, contracting with OED allows for leveraging of services provided as part of the STEP contracts.

The qualifying services provided by OED, while consistent with the services provided to the general population, will be at an enhanced or expanded capacity for the at-risk ABAWDS. There will be individualized services provided to guide the ABAWD from one activity to the next. There will also be case management provided to ensure progression and that they are meeting the work activity requirements. Regulations at 7 CFR 273.24(a) provide that fulfilling the work requirement means:

• Working 20 hours or more per week, averaged monthly to 80 hours;

- Participating in and complying with the requirements of a work program for 20 hours a week or more;
- Any combination of working and participating in a work program for a total of 20 hours per week; or

(link is external)

• Participating in and complying with the requirements of a workfare program.

Workfare is an E&T component for ABAWDS (non-exempt and living in non-waived county) to fulfill their work requirement to continue receiving their SNAP benefits beyond the three countable months in thirty-six months. The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value in their community.

Workfare hourly requirements are determined by utilizing the Fair Labor Standards Act (FLSA) and are equivalent to household benefits divided by the Oregon minimum wage. Oregon has three official minimum wage tiers, administered based on geographic areas. DHS has devised a calculator for each county based on the minimum wage tier that it falls into. This ensures that participants do not exceed the number of hours that are equivalent to their benefits divided by the official Oregon minimum wage for their geographic area. Information about Oregon's minimum wage system is available at this link: http://www.oregon.gov/boli/WHD/OMW/Pages/Minimum-Wage-Rate-Summary.aspx

As allowed by 7 CFR §273.7 and §273.24, services from other sources will count toward SNAP E&T work requirements. Other sources include:

- Work services under Workforce Innovation and Opportunity Act (WIOA); and
- Work services under the Trade Adjustment Assistance (TAA).

For FFY 2020, Oregon will comply with the commitment to offer either a qualifying education, training, or workfare opportunity to every ABAWD participant (not exempted or living in a waived county) beginning with the first complete month allowing the state to receive a portion of the \$20 million used to reimburse state agencies for costs incurred in serving ABAWDS.

Oregon is seeking additional funding for costs incurred in serving ABAWDS subject to the threemonth time limit. We anticipate that many participants will be enrolled simultaneously in more than one activity and participate for more than one month. To support participants, transportation and other necessary and related support service costs will be available to ABAWDS every month they are enrolled and participating in a component activity.

Oregon estimates spending approximately \$468.98 monthly for each non-exempt ABAWD in non-waived counties which translates to approximately \$3,894,367.72.

The additional funding is needed to ensure that qualifying work activities are offered.

For FFY 2020, Oregon will continue to provide structured components to ABAWDS through referral to OED. OED will work with the participant to utilize the array of E&T providers for ABAWD's to meet their work-related activities requirements.

Components for these areas are as follows:

- Supervised Job Search
- Job Search Training
- Job Retention

- Basic Education/Foundational Skills Instruction
- Career/Technical Education or other Vocational Training
- English Language Acquisition
- Integrated Education and Training/Bridge Program
- Work Readiness
- Self-Employment Training
- On-the-job Training
- Pre-Apprenticeship/Apprenticeship
- Internship
- Work Experience

#### Supervised Job Search:

Description: Participants who are work ready (as determined by assessment), recently unemployed, or need assistance with job search will be referred to this component. Supervised job search must have a case plan that includes oversight, tracking, review, and assessment, as well as providing regular, or at least one time per month, check-ins or meetings to report on the job search progress or to adjust the case plan. All services must be provided in a state approved location.

ABAWDS (non-exempt and those in non-waived counties): Supervised Job Search activities cannot exceed nine hours per week and must be combined with other work-related activities to equal twenty hours per week. However, if the ABAWD is participating in job search through a WIOA program/activities or in the 30 days prior to the start of workfare, they can exceed 9 hours per weekly. Participants will submit their job contact forms to OED weekly for tracking participation.

STEP: Supervised Job Search activities within this program vary, depending upon the targeted audience and provider.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers		Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Central City Concern	Multnomah County, Clackamas County	SNAP recipients who are homeless or formerly homeless	60	\$28,398.00
Dress for Success	Portland Metro	Female SNAP recipients	50	\$59,700.79
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	38	\$9,291.71
Outside In	Multnomah County	SNAP Recipients-Homeless Youth	15	\$577.45
Portland State University	Portland Metro	SNAP Recipients-Students enrolled full time or part time	10	\$1,448.80
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	3	\$3,170.90
Dress for Success	Salem Metro	Female SNAP recipients	41	\$20,921.62
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	30	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	2	\$571.00
Goodwill Industries-Lane County	Lane County	Veterans, disadvantaged and disabled SNAP recipients	208	\$17,839.48
Lane County Health and Human Services	Lane County	SNAP recipients who are unstably housed or homeless	13	\$6,052.68
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	9	\$1,741.66
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	32	\$5,072.00
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	18	\$8,328.89
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	2	\$2,919.90

	Klamath County	Veterans, disadvantaged and	11	\$1,979.17
Oregon Goodwill	-	disabled SNAP recipients	-	
Klamath Works, Inc.	Lake and Klamath County	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	31	\$15,869.33
Institute	Crook, Deschutes, Jefferson, Baker, Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	4	\$2,771.87
· ·	Clackamas, Multnomah, Marion, Washington	SNAP Recipients-Underserved youth	15	\$2,513.50
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	36	\$6,508.06
Home Plate	Washington County	SNAP recipients-Homeless Youth	6	\$1,294.11
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	304	\$93,708.92
Oregon Employment Department- STEP	Statewide	SNAP Recipients	993	\$635,900.00
Community College Consortia	Throughout state	SNAP Recipients	44	\$19,667.71

#### Job Search Training:

Description: A component that strives to enhance the job search skills of participants by providing instruction in job seeking techniques and increasing motivation and self-confidence. The component may consist of job skills assessments, job placement services, or other direct training or support activities. Other activities may include resume writing workshops and learning how to use online job search tools. The job search training component may combine job search activities with other training and support activities.

ABAWD: Job Search Training may include resume writing workshops, interviewing workshops, and more training related to Job Search. Job Search Training activities cannot exceed nine hours per week and must be combined with other work-related activities to equal twenty hours per week unless the ABAWD is participating through a WIOA program.

STEP: Job Search Training activities within this program vary, depending upon the targeted audience and providers.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Central City Concern	Multnomah County, Clackamas County	SNAP recipients who are homeless or formerly homeless	70	\$28,397.60
Dress for Success	Portland Metro	Female SNAP recipients	10	\$13,954.91
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	9	\$2,144.24
Outside In	Multnomah County	SNAP Recipients- Homeless Youth	20	\$975.50
Portland State University	Portland Metro	SNAP Recipients-Students enrolled full time or part time	10	\$1,448.80
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	36	\$3,170.90
Dress for Success	Salem Metro	Female SNAP recipients	9	\$9,509.82
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	15	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	4	\$1,816.86
Goodwill Industries-Lane County	Lane County	Veterans, disadvantaged and disabled SNAP recipients	60	\$5,146.00
Lane County Health and Human Services	Lane County	SNAP recipients who are unstably housed or homeless	8	\$3,362.60
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	4	\$634.00
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	1	\$1,751.94

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Klamath Works, Inc.	Lake and Klamath County	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	15	\$12,060.70
Baker Technical	Crook, Deschutes,	SNAP Recipients	4	\$2,771.87
Institute	Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties			
Leadership Lab	Clackamas, Multnomah, Marion, Washington	SNAP Recipients- Underserved youth	15	\$11,450.40
Clackamas	Clackamas County	SNAP Recipients	7	\$8,642.54
County Children, Family & Community Connections	-			
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	448	\$138,741.00
Work Systems	Clackamas, Clatsop,	SNAP Recipients	64	\$27,206.46
Inc Oregon Work Experience	Columbia, Tillamook, Linn, Marion, Polk, Yamhill, Multnomah, Washington, Hood River, Wasco, Sherman, Gilliam, Wheeler, Jefferson, Crook, Deschutes, Klamath, Lake, Coos, Douglas, Curry Counties			
Centro Cultural	Washington County	Spanish speaking or	7	\$1,220.26
De Condado De Washington		bilingual SNAP Recipients		
Home Plate	Washington County	SNAP recipients-Homeless Youth	7	\$2,588.21
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	243	\$93,708.90

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Oregon Employment Department- STEP	Statewide	SNAP Recipients	993	\$635,900.00
Community College Consortia	Throughout state	SNAP Recipients	95	\$42,531.07

#### Job Retention:

Description: Services provided to E&T participants who have secured employment after participating in another E&T component, are no longer participating in another E&T component, and are no longer receiving SNAP benefits. This component is meant to help achieve satisfactory performance, retain employment, or to increase earnings over time. The participant may receive up to 90 days of job retention services. The 90 days begins when the SNAP benefits end. If a participant becomes employed and is still receiving SNAP benefits, services must be provided under a component other than retention.

# ABAWD: Offered statewide to assist ABAWDS in retaining employment and increasing earning potential.

*STEP:* Most STEP providers in Oregon offer this component as a part of their program and collaborate with other STEP providers to ensure that the participant is receiving the most comprehensive Job Retention Services.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers		Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Central City	Multnomah	SNAP recipients who are	50	\$14,198.97
		homeless or formerly homeless		
	Clackamas County			
Dress for	Portland Metro	Female SNAP recipients	7	\$7,256.55
Success				
New Avenues For	Portland Metro	SNAP recipients (Youth ages	8	\$1,906.00
Youth		17-24)	_	
Outside In	Multnomah County	SNAP Recipients-Homeless	2	\$737.44
		Youth		
Portland State	Portland Metro	SNAP Recipients-Students	10	\$1,448.80
University		enrolled full time or part time		

Providers		Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Dress for	Salem Metro	Female SNAP recipients	8	\$4,945.11
Success				
Services	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	15	\$1,881.46
Youth	Lincoln County	SNAP Recipients- Ages 18-24	10	\$415.28
Development Coalition of Lincoln County				
Lane County	Lane County	SNAP recipients who are	6	\$1,569.21
Health and Human Services		unstably housed or homeless	-	
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	4	\$1,227.08
Goodwill	Curry and Coos	Veterans, disadvantaged and	8	\$3,811.53
Industries of Lane		disabled SNAP recipients		
&South Coast Counties				
Maslow	Josephine and	SNAP recipients who are	1	\$1,167.96
	Jackson County	unstably housed or homeless	_	
Southern Oregon	Klamath County	Veterans, disadvantaged and	5	\$791.67
Goodwill		disabled SNAP recipients	•	<i><i><i></i></i></i>
			10	¢0.050.00
		SNAP participants who are transitioning from drug/alcohol	10	\$8,252.00
		treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	-	
Baker Technical	Crook, Deschutes,	SNAP Recipients	2	\$1,187.94
Institute	Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties			
	Clackamas, Multnomah, Marion, Washington	SNAP Recipients-Underserved youth	15	\$2,513.50
Clackamas County Children,	Clackamas County	SNAP Recipients	3	\$2,304.68

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Community Connections				
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	29	\$40,464.17
Centro Cultural De Condado De Washington*	Washington County	Spanish speaking or bilingual SNAP Recipients	5	\$903.90
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	54	\$46,854.46
Oregon Employment Department- STEP	Statewide	SNAP Recipients	350	\$141,311.09
Community College Consortia	Throughout state	SNAP Recipients	12	\$8,791.53

# **Education Components:**

The Food and Nutrition Act of 2008 prohibits State agencies from supplanting State education costs with Federal E&T funds. Only educational components that establish a direct link to job-readiness will be approved, although programs that involved articulated career pathways or stackable credentials that ultimately lead to employment are encouraged.

Oregon's E&T funds will only be used for education/training if:

- Federal funds are not used to supplant other funding;
- The provider and/or individual has attempted to secure federal assistance (not including loans) such as the Pell Grant, and such funds are not available; and
- The education costs are associated with E&T program engagement.

Oregon will not authorize expenses for operating educational/training components that exceed the normal costs of services provided to persons *not participating* in SNAP E&T programs and educational expenses will not be paid for training/education that is normally available to the public at no cost.

Oregon's providers offer several categories of services within the education component. These are:

- Basic Education/Foundational Skills Instruction
- Career/Technical Education or other Vocational Training

- English Language Acquisition
- Integrated Education and Training/Bridge Program
- Work Readiness

#### **Basic Education / Foundational Skills Instruction:**

Description: Programs that offer academic instruction and education services below the postsecondary level that increase an individual's ability to read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent; transition to postsecondary education and training; and obtain employment. Such programs include Adult Basic Education (ABE), basic literacy, and high school equivalency (GED, TASC, HiSET, or other).

ABAWD: Educational activities are provided when they will directly enhance the participant's employability in a field with anticipated workforce shortages and may include GED testing and preparation, as well as basic literacy classes. This component is available for participants over age 21.

*STEP:* Several STEP providers have basic education components. They offer 1:1 assistance to the participant as they prepare for the ABE/GED required tests. They provide enhanced services in the form of direct tutoring/coaching which is not available to the general public. This component can be completed in conjunction with another component, such as supervised job search.

Reporting Measure(s) if >100 participants per year:

Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T

Providers	Geographic area	homeless, re-entry	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	11	\$2,620.74
Outside In	Multnomah County	SNAP Recipients- Homeless Youth	8	\$1,334.12
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	15	\$4,703.65
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	2	\$467.19
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	5	\$141.17
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	1	\$1,167.96

Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	1	\$1,979.91
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	3	\$451.95
Home Plate	Washington County	SNAP recipients- Homeless Youth	6	\$1,294.11
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	11	\$2,500.00
Oregon Employment Department-STEP	Statewide	SNAP Recipients	100	\$15,917.00
Community College Consortia	Throughout state	SNAP Recipients	160	\$116,644.85

#### Career / Technical Education or Other Vocational Training:

Description: Organized activities at the post-secondary level that provide individuals with the academic and technical knowledge and skills necessary to prepare for further education and for careers in current or emerging employment sectors. Programs are primarily designed for those who are beyond the age of compulsory high school attendance. Ideally, such programs should be employer-driven and could lead to industry-recognized certificates or credentials.

ABAWD: This component is offered depending upon geographic region and available resources. OED refers ABAWD participants to STEP providers offering Career/Technical Education or Other Vocational Training, and will be given support service funding to assist participants in the training costs.

STEP: Several STEP providers provide participants with multiple options for certificate programs such as CNA, Flagging, Pesticide Certification, Master Gardner Certification, Food Handler's training, and Oregon Liquor Control Certification. The participants are coached through their training with enhanced case management.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4th quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Dress for Success	Portland Metro	Female SNAP recipients	8	\$3,907.37

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	4	\$953.00
Outside In	Multnomah County	SNAP Recipients- Homeless Youth	7	\$2,581.03
Portland State University	Portland Metro	SNAP Recipients-Students enrolled full time or part time	44	\$3,622.00
Dress for Success	Salem Metro	Female SNAP recipients	5	\$2,662.75
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	30	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	30	\$778.65
Food for Lane	Lane County	SNAP recipients	16	\$8,003.55
Goodwill Industries-Lane County	Lane County	Veterans, disadvantaged and disabled SNAP recipients	10	\$857.66
Lane County Health and Human Services	Lane County	SNAP recipients who are unstably housed or homeless	2	\$11,432.80
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	2	\$1,227.08
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	2	\$317.00
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	2	\$988.17
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	10	\$1,167.96
Southern Oregon Goodwill	Klamath County	Veterans, disadvantaged and disabled SNAP recipients	2	\$593.75

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Klamath Works, Inc.	Lake and Klamath County	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	7	\$3,173.88
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	5	\$27,718.70
Clackamas County Children, Family & Community Connections	Clackamas County	SNAP Recipients	4	\$576.17
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	43	\$36,257.10
Work Systems Inc Oregon Work Experience	Clackamas, Clatsop, Columbia, Tillamook, Linn, Marion, Polk, Yamhill, Multnomah, Washington, Hood River, Wasco, Sherman, Gilliam, Wheeler, Jefferson, Crook, Deschutes, Klamath, Lake, Coos, Douglas, Curry Counties	SNAP Recipients	41	\$17,394.29
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	44	\$7,954.30
Home Plate	Washington County	SNAP recipients-Homeless Youth	7	\$3,623.50
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	44	\$3,750.00
Oregon Employment	Statewide	SNAP Recipients	400	\$212,222.64

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Department- STEP				
Community College Consortia	Throughout state	SNAP Recipients	396	\$290,685.99

# English Language Acquisition:

Description: A component designed to help English language learners achieve competence in reading, writing, speaking, and comprehension of the English language.

ABAWD: This component is offered depending participant need and availability. Participants attend short-term ELA training as a component of their case plan.

STEP: Oregon's STEP providers work with participants to determine the case plan that will assist with the components needed to gain employment. The STEP providers listed below have an identified ELA program. (Note: Most STEP providers refer participants to needed ESL courses and some have included this in their participant numbers/program costs under Basic Education.)

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re- entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	1	\$362.20
Sparrow Furniture	Salem Metro	SNAP Recipients – resettled refugee and asylees	7	\$3,300.84
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP Recipients	6	\$940.73
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker, Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	3	\$791.96
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	3	\$4,519.49
Home Plate	Washington County	SNAP recipients- Homeless Youth	4	\$258.82
Oregon Employment	Statewide	SNAP Recipients	11	\$1,250.00

Providers	Geographic area	Target audience (e.g., homeless, re- entry population, ABAWDS)		Anticipated monthly cost
Department-				
ABAWD				
Oregon	Statewide	SNAP Recipients	100	\$70,740.88
Employment				
Department-STEP				
Community	Throughout state	SNAP Recipients	71	\$37,890.69
College Consortia				

#### Integrated Education and Training/Bridge Programs:

Description: Programs that provide adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or group of occupations for the purpose of educational and career advancement.

Reporting Measure(s) if >100 participants per year:

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	3	\$724.40
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP Recipients	15	\$14,110.94
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	10	\$415.28
Community College Consortia	Throughout state	SNAP Recipients	54	\$57,936.75

#### Work Readiness Training:

Description: Intensive programs that include skill assessment and educational remediation services that prepare individuals for the workforce. Work readiness skills may include both foundational cognitive skills such as reading for information, applied mathematics, locating information, problem solving, and critical thinking and non-cognitive skills, or soft skills, which are defined as personal characteristics and behavioral skills that enhance an individual's interactions, job performance, and career prospects such as adaptability, integrity, cooperation, and workplace discipline.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Outside In	Multnomah County	SNAP Recipients – Homeless Youth	10	\$3,687.14
Portland State University	Portland Metro	SNAP Recipients	2	\$724.40
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP Recipients	15	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	2	\$415.28
Klamath Works, Inc	Lake and Klamath Counties	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	23	\$22,217.13
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	5	\$1,187.94
Clackamas Workforce Partnership*	Clackamas County	SNAP Recipients	8	\$7,859.67
Leadership Lab	Clackamas, Multnomah, Marion, Washington	SNAP Recipients-Underserved youth	15	\$11,450.38

# Work Components:

- On-the-Job Training (OJT)
- Self-Employment Training
- Pre-Apprenticeships and Apprenticeships
- Internship Programs
- Workfare
- Work Experience

# On-the-Job Training (OJT):

Description: A work placement made through a contract with an employer or registered apprenticeship program sponsor in the public, private non-profit, or private sector. An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's individual employment plan

Reporting Measure(s) if >100 participants per year: N/A

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	5	\$1,448.80
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	3	\$940.73

#### Self-Employment Training:

Description: A component that improves the employability of participants by providing training in setting-up and operating a small business or other self-employment venture.

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	2	\$181.10
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$4,703.65
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	3	\$311.46

## **Pre-Apprenticeships and Apprenticeships**

**Description:** A combination of on-the-job training and related instruction in which workers learn the practical and theoretical aspects of a skilled occupation. Apprenticeship programs can be sponsored by individual employers, joint employer and labor groups, and/or employer associations. Pre-Apprenticeship programs provide individuals with the basic and technical skills necessary to enter an apprenticeship program and should be directly linked to an apprenticeship program.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Outside In	Multnomah County	SNAP Recipients – Homeless Youth	2	\$97.55
Sparrow Furniture	Salem Metro	SNAP Recipients – resettled refugee and asylees	21	\$29,707.67
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$940.73
Klamath Works, Inc	Counties	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	2	\$1,269.55
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	28	\$35,056.92
Home Plate	Washington County	SNAP recipients-Homeless Youth	3	\$1,294.10
Community College Consortia	Throughout state	SNAP Recipients	17	\$22,850.06

## Internship:

Description: A planned, structured learning experience that takes place in a workplace for a limited period of time.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	homeless, re-entry	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	10	\$1,448.80
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	3	\$3,170.90

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$9,407.29
Home Plate	Washington County	SNAP recipients- Homeless Youth	3	\$3,588.21
Community College Consortia	Throughout state	SNAP Recipients	35	\$16,864.82

## Work Experience:

Description:

A work component designed to improve the employability of participants through actual work experience and/or training. Work experience assignments may not replace the employment of a regularly employed individual, and they must provide the same benefits and working conditions provided to regularly employed individuals performing comparable work for comparable hours. It is permissible to place E&T participants in work experience positions with private sector entities. In Oregon, this component is only offered for STEP participants who are non-ABAWD or ABAWD exempt.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Central City	Multnomah County,	SNAP recipients who are	615	\$86,771.30
Concern	Clackamas County	homeless or formerly homeless		
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17- 24)	9	\$6,909.22
Outside In	Multnomah County	SNAP Recipients-Homeless Youth	45	\$5,497.00
Portland State University	Portland Metro	SNAP Recipients	5	\$1,448.80
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	3	\$23,613.00
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$18,814.58
Goodwill Industries of	Lane County	Veterans, disadvantaged and disabled SNAP recipients	3	\$257.30

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Lane &South Coast Counties	-			
	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	6	\$79.25
	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	2	\$7,764.22
Southern Oregon Goodwill	Klamath County	Veterans, disadvantaged and disabled SNAP recipients		\$593.75
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	5	\$197.92
	Lake and Klamath Counties	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	15	\$8,252,08
Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	10	\$1,187.94
Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	8	\$6,459.71
Centro Cultural De Condado De Washington		Spanish speaking or bilingual SNAP Recipients	2	\$4,338.71
Community College Consortia	Throughout state	SNAP Recipients	5	\$4,195.47

Workfare (for non-exempt ABAWDS in non-waived counties only)

## Workfare:

Description: A work component in which SNAP recipients perform work in a public service capacity as a condition of eligibility. In lieu of wages, workfare participants receive compensation in the form of their household's monthly coupon allotment. The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value to the community. Only ABAWD's who reside in non-waived counties may participate in workfare.

Oregon has the sole responsibility of establishing Workfare sites. They must be a private or public non-profit agency serving in a public service capacity.

Oregon is also currently contracting with the Oregon Food Bank (OFB) to provide services across the state. Within the contract, OFB and other Workfare partner sites will have oversight of worksite placements and agreements. OFB will report quarterly on the required outcomes to DHS. In addition, other organizations, in the counties subject to the time limits, have been approved to be included as workfare sites.

OED, as the statewide ABAWD provider, has data sharing agreements and an MOU with all approved Workfare partners. They are responsible for referring ABAWD participants to their sites.

DHS will determine the workfare hours. In Oregon, the maximum number of hours that are required (and allowed) of an ABAWD each month is determined by dividing the household's SNAP benefit allotment by the State minimum wage. This is then divided by four to get the maximum weekly hours, rounding down if needed. As of 7/1/17, we have three official State minimum wage tiers. Link to Oregon wage rate information: http://www.oregon.gov/boli/WHD/OMW/Pages/Minimum-Wage-Rate-Summary.aspx

(link is external)

FLSA is calculated by using the minimum wage where the workfare position is performed. If a participant meets the FLSA level of participation in workfare, they do not need to participate in other activities to continue getting their SNAP benefits beyond three months.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Benton Habitat for Humanity	Benton County	ABAWDS	10	\$0.00
Bethlehem House of Bread*	Washington County	ABAWDS	TBD	\$0.00
Catholic Community Charities*	Marion County	ABAWDS	20	\$0.00
Clackamas Service Center*	Clackamas County	ABAWDS	8	\$0.00
Clay Street Table*	Multnomah	ABAWDS	6	\$0.00
EMO NE Emergency Food Program*	Multnomah	ABAWDS	6	\$0.00

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Forest Grove Assembly of God Church*	Washington County	ABAWDS	3	\$0.00
Good Roots Community Church Food Pantry*	Clackamas County	ABAWDS	4	\$0.00
HOPE First Baptist Church Food Pantry*	Clackamas County	ABAWDS	TBD	\$0.00
Marion Polk Food Share*	Marion County	ABAWDS	10	\$0.00
Neighborhood House Food Pantry*	Multnomah	ABAWDS	20	\$0
Oregon Food Bank	Multnomah and Washington Counties	ABAWDS	50	\$9,012.66
SnowCap Community Charities*	Multnomah	ABAWDS	4	\$0
Tualatin Schoolhouse Pantry*	Washington County	ABAWDS	3	\$0.00
Wilsonville Community Sharing*	Clackamas County	ABAWDS	5	\$0.00

\*Affiliate of Oregon Food Bank

# 3. A description of management controls in place to meet pledge requirements;

Oregon pledges to offer a qualifying activity to each at-risk ABAWD applicant or recipient (not exempted or in a waived county) beginning with the first complete month of eligibility. Non-exempt and non-waived ABAWDS are not eligible to receive SNAP benefits for more than three months in a 36-month period unless the individual meets the work requirement.

Oregon has elected to have a statewide contract for ABAWD services. OED has been selected to be this provider. This will ensure consistent and qualifying services are provided to all at-risk ABAWDS. Due to limited funding provided through the ABAWD Pledge funds, contracting with OED allows for leveraging of services provided as part of the STEP contracts.

The qualifying services provided by OED, while consistent with the services provided to the general population, will be at an enhanced or expanded capacity for the at-risk ABAWDS. There will be individualized services provided to guide the ABAWD from one activity to the next. There will also be case management provided to ensure progression and that they are meeting the work activity requirements. Regulations at 7 CFR 273.24(a) provide that fulfilling the work requirement means:

• Working 20 hours or more per week, averaged monthly to 80 hours;

- Participating in and complying with the requirements of a work program for 20 hours a week or more;
- Any combination of working and participating in a work program for a total of 20 hours per week; or

(link is external)

• Participating in and complying with the requirements of a workfare program.

Workfare is an E&T component for ABAWDS (non-exempt and living in non-waived county) to fulfill their work requirement to continue receiving their SNAP benefits beyond the three countable months in thirty-six months. The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value in their community.

Workfare hourly requirements are determined by utilizing the Fair Labor Standards Act (FLSA) and are equivalent to household benefits divided by the Oregon minimum wage. Oregon has three official minimum wage tiers, administered based on geographic areas. DHS has devised a calculator for each county based on the minimum wage tier that it falls into. This ensures that participants do not exceed the number of hours that are equivalent to their benefits divided by the official Oregon minimum wage for their geographic area. Information about Oregon's minimum wage system is available at this link: http://www.oregon.gov/boli/WHD/OMW/Pages/Minimum-Wage-Rate-Summary.aspx

As allowed by 7 CFR §273.7 and §273.24, services from other sources will count toward SNAP E&T work requirements. Other sources include:

- Work services under Workforce Innovation and Opportunity Act (WIOA); and
- Work services under the Trade Adjustment Assistance (TAA).

For FFY 2020, Oregon will comply with the commitment to offer either a qualifying education, training, or workfare opportunity to every ABAWD participant (not exempted or living in a waived county) beginning with the first complete month allowing the state to receive a portion of the \$20 million used to reimburse state agencies for costs incurred in serving ABAWDS.

Oregon is seeking additional funding for costs incurred in serving ABAWDS subject to the threemonth time limit. We anticipate that many participants will be enrolled simultaneously in more than one activity and participate for more than one month. To support participants, transportation and other necessary and related support service costs will be available to ABAWDS every month they are enrolled and participating in a component activity.

Oregon estimates spending approximately \$468.98 monthly for each non-exempt ABAWD in non-waived counties which translates to approximately \$3,894,367.72.

The additional funding is needed to ensure that qualifying work activities are offered.

For FFY 2020, Oregon will continue to provide structured components to ABAWDS through referral to OED. OED will work with the participant to utilize the array of E&T providers for ABAWD's to meet their work-related activities requirements.

Components for these areas are as follows:

- Supervised Job Search
- Job Search Training
- Job Retention

- Basic Education/Foundational Skills Instruction
- Career/Technical Education or other Vocational Training
- English Language Acquisition
- Integrated Education and Training/Bridge Program
- Work Readiness
- Self-Employment Training
- On-the-job Training
- Pre-Apprenticeship/Apprenticeship
- Internship
- Work Experience

## Supervised Job Search:

Description: Participants who are work ready (as determined by assessment), recently unemployed, or need assistance with job search will be referred to this component. Supervised job search must have a case plan that includes oversight, tracking, review, and assessment, as well as providing regular, or at least one time per month, check-ins or meetings to report on the job search progress or to adjust the case plan. All services must be provided in a state approved location.

ABAWDS (non-exempt and those in non-waived counties): Supervised Job Search activities cannot exceed nine hours per week and must be combined with other work-related activities to equal twenty hours per week. However, if the ABAWD is participating in job search through a WIOA program/activities or in the 30 days prior to the start of workfare, they can exceed 9 hours per weekly. Participants will submit their job contact forms to OED weekly for tracking participation.

STEP: Supervised Job Search activities within this program vary, depending upon the targeted audience and provider.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers		Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Central City Concern		SNAP recipients who are homeless or formerly homeless	60	\$28,398.00
Dress for Success	Portland Metro	Female SNAP recipients	50	\$59,700.79
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	38	\$9,291.71
Outside In		SNAP Recipients-Homeless Youth	15	\$577.45
Portland State University		SNAP Recipients-Students enrolled full time or part time	10	\$1,448.80
Stone Soup		SNAP Recipients at risk of homelessness	3	\$3,170.90
Dress for Success	Salem Metro	Female SNAP recipients	41	\$20,921.62
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	30	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	2	\$571.00
Goodwill Industries-Lane County	Lane County	Veterans, disadvantaged and disabled SNAP recipients	208	\$17,839.48
Lane County Health and Human Services		SNAP recipients who are unstably housed or homeless	13	\$6,052.68
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	9	\$1,741.66
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	32	\$5,072.00
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	18	\$8,328.89
Maslow	-	SNAP recipients who are unstably housed or homeless	2	\$2,919.90

	Klamath County	Veterans, disadvantaged and	11	\$1,979.17
Oregon Goodwill	-	disabled SNAP recipients	-	
Klamath Works, Inc.	Lake and Klamath County	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	31	\$15,869.33
Institute	Crook, Deschutes, Jefferson, Baker, Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	4	\$2,771.87
· ·	Clackamas, Multnomah, Marion, Washington	SNAP Recipients-Underserved youth	15	\$2,513.50
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	36	\$6,508.06
Home Plate	Washington County	SNAP recipients-Homeless Youth	6	\$1,294.11
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	304	\$93,708.92
Oregon Employment Department- STEP	Statewide	SNAP Recipients	993	\$635,900.00
Community College Consortia	Throughout state	SNAP Recipients	44	\$19,667.71

# Job Search Training:

Description: A component that strives to enhance the job search skills of participants by providing instruction in job seeking techniques and increasing motivation and self-confidence. The component may consist of job skills assessments, job placement services, or other direct training or support activities. Other activities may include resume writing workshops and learning how to use online job search tools. The job search training component may combine job search activities with other training and support activities.

ABAWD: Job Search Training may include resume writing workshops, interviewing workshops, and more training related to Job Search. Job Search Training activities cannot exceed nine hours per week and must be combined with other work-related activities to equal twenty hours per week unless the ABAWD is participating through a WIOA program.

STEP: Job Search Training activities within this program vary, depending upon the targeted audience and providers.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Central City Concern	Multnomah County, Clackamas County	SNAP recipients who are homeless or formerly homeless	70	\$28,397.60
Dress for Success	Portland Metro	Female SNAP recipients	10	\$13,954.91
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	9	\$2,144.24
Outside In	Multnomah County	SNAP Recipients- Homeless Youth	20	\$975.50
Portland State University	Portland Metro	SNAP Recipients-Students enrolled full time or part time	10	\$1,448.80
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	36	\$3,170.90
Dress for Success	Salem Metro	Female SNAP recipients	9	\$9,509.82
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	15	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	4	\$1,816.86
Goodwill Industries-Lane County	Lane County	Veterans, disadvantaged and disabled SNAP recipients	60	\$5,146.00
Lane County Health and Human Services	Lane County	SNAP recipients who are unstably housed or homeless	8	\$3,362.60
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	4	\$634.00
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	1	\$1,751.94

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Klamath Works, Inc.	Lake and Klamath County	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	15	\$12,060.70
Baker Technical	Crook, Deschutes,	SNAP Recipients	4	\$2,771.87
Institute	Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties			
Leadership Lab	Clackamas, Multnomah, Marion, Washington	SNAP Recipients- Underserved youth	15	\$11,450.40
Clackamas	Clackamas County	SNAP Recipients	7	\$8,642.54
County Children, Family & Community Connections	-			
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	448	\$138,741.00
Work Systems	Clackamas, Clatsop,	SNAP Recipients	64	\$27,206.46
Inc Oregon Work Experience	Columbia, Tillamook, Linn, Marion, Polk, Yamhill, Multnomah, Washington, Hood River, Wasco, Sherman, Gilliam, Wheeler, Jefferson, Crook, Deschutes, Klamath, Lake, Coos, Douglas, Curry Counties			
Centro Cultural	Washington County	Spanish speaking or	7	\$1,220.26
De Condado De Washington		bilingual SNAP Recipients		
Home Plate	Washington County	SNAP recipients-Homeless Youth	7	\$2,588.21
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	243	\$93,708.90

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Oregon Employment Department- STEP	Statewide	SNAP Recipients	993	\$635,900.00
Community College Consortia	Throughout state	SNAP Recipients	95	\$42,531.07

# Job Retention:

Description: Services provided to E&T participants who have secured employment after participating in another E&T component, are no longer participating in another E&T component, and are no longer receiving SNAP benefits. This component is meant to help achieve satisfactory performance, retain employment, or to increase earnings over time. The participant may receive up to 90 days of job retention services. The 90 days begins when the SNAP benefits end. If a participant becomes employed and is still receiving SNAP benefits, services must be provided under a component other than retention.

# ABAWD: Offered statewide to assist ABAWDS in retaining employment and increasing earning potential.

*STEP:* Most STEP providers in Oregon offer this component as a part of their program and collaborate with other STEP providers to ensure that the participant is receiving the most comprehensive Job Retention Services.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers		Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
		SNAP recipients who are homeless or formerly homeless	50	\$14,198.97
Dress for Success	Portland Metro	Female SNAP recipients	7	\$7,256.55
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	8	\$1,906.00
Outside In	Multnomah County	SNAP Recipients-Homeless Youth	2	\$737.44
Portland State University		SNAP Recipients-Students enrolled full time or part time	10	\$1,448.80

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Dress for	Salem Metro	Female SNAP recipients	8	\$4,945.11
Success	-			
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	15	\$1,881.46
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	10	\$415.28
Lane County	Lane County	SNAP recipients who are	6	\$1,569.21
Health and Human Services		unstably housed or homeless	_	
Southern Oregon	Douglas County	Veterans, disadvantaged and	4	\$1,227.08
Goodwill		disabled SNAP recipients		+ - ,
Goodwill Industries of Lane	Curry and Coos	Veterans, disadvantaged and disabled SNAP recipients	8	\$3,811.53
&South Coast Counties			-	
Maslow	Josephine and	SNAP recipients who are	1	\$1,167.96
	Jackson County	unstably housed or homeless	_	
Southern Oregon Goodwill	Klamath County	Veterans, disadvantaged and disabled SNAP recipients	5	\$791.67
Klamath Works,	Lake and Klamath	SNAP participants who are	10	\$8,252.00
Inc.		transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	-	
Baker Technical	Crook, Deschutes,	SNAP Recipients	2	\$1,187.94
Institute	Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties			
Leadership Lab	Clackamas, Multnomah, Marion, Washington	SNAP Recipients-Underserved youth	15	\$2,513.50
Clackamas County Children, Family &	Clackamas County	SNAP Recipients	3	\$2,304.68

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Community Connections	_			
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	29	\$40,464.17
Centro Cultural De Condado De Washington*	Washington County	Spanish speaking or bilingual SNAP Recipients	5	\$903.90
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	54	\$46,854.46
Oregon Employment Department- STEP	Statewide	SNAP Recipients	350	\$141,311.09
Community College Consortia	Throughout state	SNAP Recipients	12	\$8,791.53

# **Education Components:**

The Food and Nutrition Act of 2008 prohibits State agencies from supplanting State education costs with Federal E&T funds. Only educational components that establish a direct link to job-readiness will be approved, although programs that involved articulated career pathways or stackable credentials that ultimately lead to employment are encouraged.

Oregon's E&T funds will only be used for education/training if:

- Federal funds are not used to supplant other funding;
- The provider and/or individual has attempted to secure federal assistance (not including loans) such as the Pell Grant, and such funds are not available; and
- The education costs are associated with E&T program engagement.

Oregon will not authorize expenses for operating educational/training components that exceed the normal costs of services provided to persons *not participating* in SNAP E&T programs and educational expenses will not be paid for training/education that is normally available to the public at no cost.

Oregon's providers offer several categories of services within the education component. These are:

- Basic Education/Foundational Skills Instruction
- Career/Technical Education or other Vocational Training

- English Language Acquisition
- Integrated Education and Training/Bridge Program
- Work Readiness

# **Basic Education / Foundational Skills Instruction:**

Description: Programs that offer academic instruction and education services below the postsecondary level that increase an individual's ability to read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent; transition to postsecondary education and training; and obtain employment. Such programs include Adult Basic Education (ABE), basic literacy, and high school equivalency (GED, TASC, HiSET, or other).

ABAWD: Educational activities are provided when they will directly enhance the participant's employability in a field with anticipated workforce shortages and may include GED testing and preparation, as well as basic literacy classes. This component is available for participants over age 21.

*STEP:* Several STEP providers have basic education components. They offer 1:1 assistance to the participant as they prepare for the ABE/GED required tests. They provide enhanced services in the form of direct tutoring/coaching which is not available to the general public. This component can be completed in conjunction with another component, such as supervised job search.

Reporting Measure(s) if >100 participants per year:

Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T

Providers	Geographic area	homeless, re-entry	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	11	\$2,620.74
Outside In	Multnomah County	SNAP Recipients- Homeless Youth	8	\$1,334.12
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	15	\$4,703.65
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	2	\$467.19
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	5	\$141.17
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	1	\$1,167.96

Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	1	\$1,979.91
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	3	\$451.95
Home Plate	Washington County	SNAP recipients- Homeless Youth	6	\$1,294.11
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	11	\$2,500.00
Oregon Employment Department-STEP	Statewide	SNAP Recipients	100	\$15,917.00
Community College Consortia	Throughout state	SNAP Recipients	160	\$116,644.85

# Career / Technical Education or Other Vocational Training:

Description: Organized activities at the post-secondary level that provide individuals with the academic and technical knowledge and skills necessary to prepare for further education and for careers in current or emerging employment sectors. Programs are primarily designed for those who are beyond the age of compulsory high school attendance. Ideally, such programs should be employer-driven and could lead to industry-recognized certificates or credentials.

ABAWD: This component is offered depending upon geographic region and available resources. OED refers ABAWD participants to STEP providers offering Career/Technical Education or Other Vocational Training, and will be given support service funding to assist participants in the training costs.

STEP: Several STEP providers provide participants with multiple options for certificate programs such as CNA, Flagging, Pesticide Certification, Master Gardner Certification, Food Handler's training, and Oregon Liquor Control Certification. The participants are coached through their training with enhanced case management.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4th quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Dress for Success	Portland Metro	Female SNAP recipients	8	\$3,907.37

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	4	\$953.00
Outside In	Multnomah County	SNAP Recipients- Homeless Youth	7	\$2,581.03
Portland State University	Portland Metro	SNAP Recipients-Students enrolled full time or part time	44	\$3,622.00
Dress for Success	Salem Metro	Female SNAP recipients	5	\$2,662.75
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	30	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	30	\$778.65
Food for Lane	Lane County	SNAP recipients	16	\$8,003.55
Goodwill Industries-Lane County	Lane County	Veterans, disadvantaged and disabled SNAP recipients	10	\$857.66
Lane County Health and Human Services	Lane County	SNAP recipients who are unstably housed or homeless	2	\$11,432.80
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	2	\$1,227.08
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	2	\$317.00
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	2	\$988.17
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	10	\$1,167.96
Southern Oregon Goodwill	Klamath County	Veterans, disadvantaged and disabled SNAP recipients	2	\$593.75

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Klamath Works, Inc.	Lake and Klamath County	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	7	\$3,173.88
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	5	\$27,718.70
Clackamas County Children, Family & Community Connections	Clackamas County	SNAP Recipients	4	\$576.17
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	43	\$36,257.10
Work Systems Inc Oregon Work Experience	Clackamas, Clatsop, Columbia, Tillamook, Linn, Marion, Polk, Yamhill, Multnomah, Washington, Hood River, Wasco, Sherman, Gilliam, Wheeler, Jefferson, Crook, Deschutes, Klamath, Lake, Coos, Douglas, Curry Counties	SNAP Recipients	41	\$17,394.29
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	44	\$7,954.30
Home Plate	Washington County	SNAP recipients-Homeless Youth	7	\$3,623.50
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	44	\$3,750.00
Oregon Employment	Statewide	SNAP Recipients	400	\$212,222.64

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Department- STEP				
Community College Consortia	Throughout state	SNAP Recipients	396	\$290,685.99

# English Language Acquisition:

Description: A component designed to help English language learners achieve competence in reading, writing, speaking, and comprehension of the English language.

ABAWD: This component is offered depending participant need and availability. Participants attend short-term ELA training as a component of their case plan.

STEP: Oregon's STEP providers work with participants to determine the case plan that will assist with the components needed to gain employment. The STEP providers listed below have an identified ELA program. (Note: Most STEP providers refer participants to needed ESL courses and some have included this in their participant numbers/program costs under Basic Education.)

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re- entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	1	\$362.20
Sparrow Furniture	Salem Metro	SNAP Recipients – resettled refugee and asylees	7	\$3,300.84
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP Recipients	6	\$940.73
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker, Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	3	\$791.96
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	3	\$4,519.49
Home Plate	Washington County	SNAP recipients- Homeless Youth	4	\$258.82
Oregon Employment	Statewide	SNAP Recipients	11	\$1,250.00

Providers	Geographic area	Target audience (e.g., homeless, re- entry population, ABAWDS)		Anticipated monthly cost
Department-				
ABAWD				
Oregon	Statewide	SNAP Recipients	100	\$70,740.88
Employment				
Department-STEP				
Community	Throughout state	SNAP Recipients	71	\$37,890.69
College Consortia				

# Integrated Education and Training/Bridge Programs:

Description: Programs that provide adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or group of occupations for the purpose of educational and career advancement.

Reporting Measure(s) if >100 participants per year:

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	3	\$724.40
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP Recipients	15	\$14,110.94
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	10	\$415.28
Community College Consortia	Throughout state	SNAP Recipients	54	\$57,936.75

# Work Readiness Training:

Description: Intensive programs that include skill assessment and educational remediation services that prepare individuals for the workforce. Work readiness skills may include both foundational cognitive skills such as reading for information, applied mathematics, locating information, problem solving, and critical thinking and non-cognitive skills, or soft skills, which are defined as personal characteristics and behavioral skills that enhance an individual's interactions, job performance, and career prospects such as adaptability, integrity, cooperation, and workplace discipline.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Outside In	Multnomah County	SNAP Recipients – Homeless Youth	10	\$3,687.14
Portland State University	Portland Metro	SNAP Recipients	2	\$724.40
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP Recipients	15	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	2	\$415.28
Klamath Works, Inc	Lake and Klamath Counties	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	23	\$22,217.13
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	5	\$1,187.94
Clackamas Workforce Partnership*	Clackamas County	SNAP Recipients	8	\$7,859.67
Leadership Lab	Clackamas, Multnomah, Marion, Washington	SNAP Recipients-Underserved youth	15	\$11,450.38

# Work Components:

- On-the-Job Training (OJT)
- Self-Employment Training
- Pre-Apprenticeships and Apprenticeships
- Internship Programs
- Workfare
- Work Experience

# On-the-Job Training (OJT):

Description: A work placement made through a contract with an employer or registered apprenticeship program sponsor in the public, private non-profit, or private sector. An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's individual employment plan

Reporting Measure(s) if >100 participants per year: N/A

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	5	\$1,448.80
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	3	\$940.73

#### Self-Employment Training:

Description: A component that improves the employability of participants by providing training in setting-up and operating a small business or other self-employment venture.

Reporting Measure(s) if >100 participants per year: N/A
---

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	2	\$181.10
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$4,703.65
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	3	\$311.46

## **Pre-Apprenticeships and Apprenticeships**

**Description:** A combination of on-the-job training and related instruction in which workers learn the practical and theoretical aspects of a skilled occupation. Apprenticeship programs can be sponsored by individual employers, joint employer and labor groups, and/or employer associations. Pre-Apprenticeship programs provide individuals with the basic and technical skills necessary to enter an apprenticeship program and should be directly linked to an apprenticeship program.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Outside In	Multnomah County	SNAP Recipients – Homeless Youth	2	\$97.55
Sparrow Furniture	Salem Metro	SNAP Recipients – resettled refugee and asylees	21	\$29,707.67
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$940.73
Klamath Works, Inc	Counties	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	2	\$1,269.55
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	28	\$35,056.92
Home Plate	Washington County	SNAP recipients-Homeless Youth	3	\$1,294.10
Community College Consortia	Throughout state	SNAP Recipients	17	\$22,850.06

## Internship:

Description: A planned, structured learning experience that takes place in a workplace for a limited period of time.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	homeless, re-entry	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	10	\$1,448.80
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	3	\$3,170.90

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$9,407.29
Home Plate	Washington County	SNAP recipients- Homeless Youth	3	\$3,588.21
Community College Consortia	Throughout state	SNAP Recipients	35	\$16,864.82

## Work Experience:

Description:

A work component designed to improve the employability of participants through actual work experience and/or training. Work experience assignments may not replace the employment of a regularly employed individual, and they must provide the same benefits and working conditions provided to regularly employed individuals performing comparable work for comparable hours. It is permissible to place E&T participants in work experience positions with private sector entities. In Oregon, this component is only offered for STEP participants who are non-ABAWD or ABAWD exempt.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Central City	Multnomah County,	SNAP recipients who are	615	\$86,771.30
Concern	Clackamas County	homeless or formerly homeless		
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17- 24)	9	\$6,909.22
Outside In	Multnomah County	SNAP Recipients-Homeless Youth	45	\$5,497.00
Portland State University	Portland Metro	SNAP Recipients	5	\$1,448.80
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	3	\$23,613.00
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$18,814.58
Goodwill Industries of	Lane County	Veterans, disadvantaged and disabled SNAP recipients	3	\$257.30

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Lane &South Coast Counties	-			
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	6	\$79.25
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	2	\$7,764.22
Southern Oregon Goodwill	Klamath County	Veterans, disadvantaged and disabled SNAP recipients	1	\$593.75
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	5	\$197.92
Klamath Works, Inc	Lake and Klamath Counties	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	15	\$8,252,08
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	10	\$1,187.94
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	8	\$6,459.71
Centro Cultural De Condado De Washington		Spanish speaking or bilingual SNAP Recipients	2	\$4,338.71
Community College Consortia	Throughout state	SNAP Recipients	5	\$4,195.47

Workfare (for non-exempt ABAWDS in non-waived counties only)

## Workfare:

Description: A work component in which SNAP recipients perform work in a public service capacity as a condition of eligibility. In lieu of wages, workfare participants receive compensation in the form of their household's monthly coupon allotment. The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value to the community. Only ABAWD's who reside in non-waived counties may participate in workfare.

Oregon has the sole responsibility of establishing Workfare sites. They must be a private or public non-profit agency serving in a public service capacity.

Oregon is also currently contracting with the Oregon Food Bank (OFB) to provide services across the state. Within the contract, OFB and other Workfare partner sites will have oversight of worksite placements and agreements. OFB will report quarterly on the required outcomes to DHS. In addition, other organizations, in the counties subject to the time limits, have been approved to be included as workfare sites.

OED, as the statewide ABAWD provider, has data sharing agreements and an MOU with all approved Workfare partners. They are responsible for referring ABAWD participants to their sites.

DHS will determine the workfare hours. In Oregon, the maximum number of hours that are required (and allowed) of an ABAWD each month is determined by dividing the household's SNAP benefit allotment by the State minimum wage. This is then divided by four to get the maximum weekly hours, rounding down if needed. As of 7/1/17, we have three official State minimum wage tiers. Link to Oregon wage rate information: http://www.oregon.gov/boli/WHD/OMW/Pages/Minimum-Wage-Rate-Summary.aspx

(link is external)

FLSA is calculated by using the minimum wage where the workfare position is performed. If a participant meets the FLSA level of participation in workfare, they do not need to participate in other activities to continue getting their SNAP benefits beyond three months.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Benton Habitat for Humanity	Benton County	ABAWDS	10	\$0.00
Bethlehem House of Bread*	Washington County	ABAWDS	TBD	\$0.00
Catholic Community Charities*	Marion County	ABAWDS	20	\$0.00
Clackamas Service Center*	Clackamas County	ABAWDS	8	\$0.00
Clay Street Table*	Multnomah	ABAWDS	6	\$0.00
EMO NE Emergency Food Program*	Multnomah	ABAWDS	6	\$0.00

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Forest Grove Assembly of God Church*	Washington County	ABAWDS	3	\$0.00
Good Roots Community Church Food Pantry*	Clackamas County	ABAWDS	4	\$0.00
HOPE First Baptist Church Food Pantry*	Clackamas County	ABAWDS	TBD	\$0.00
Marion Polk Food Share*	Marion County	ABAWDS	10	\$0.00
Neighborhood House Food Pantry*	Multnomah	ABAWDS	20	\$0
Oregon Food Bank	Multnomah and Washington Counties	ABAWDS	50	\$9,012.66
SnowCap Community Charities*	Multnomah	ABAWDS	4	\$0
Tualatin Schoolhouse Pantry*	Washington County	ABAWDS	3	\$0.00
Wilsonville Community Sharing*	Clackamas County	ABAWDS	5	\$0.00
L		1	1	1

\*Affiliate of Oregon Food Bank

# 4. A discussion of its capacity and ability to serve at-risk ABAWDs;

Oregon pledges to offer a qualifying activity to each at-risk ABAWD applicant or recipient (not exempted or in a waived county) beginning with the first complete month of eligibility. Non-exempt and non-waived ABAWDS are not eligible to receive SNAP benefits for more than three months in a 36-month period unless the individual meets the work requirement.

Oregon has elected to have a statewide contract for ABAWD services. OED has been selected to be this provider. This will ensure consistent and qualifying services are provided to all at-risk ABAWDS. Due to limited funding provided through the ABAWD Pledge funds, contracting with OED allows for leveraging of services provided as part of the STEP contracts.

The qualifying services provided by OED, while consistent with the services provided to the general population, will be at an enhanced or expanded capacity for the at-risk ABAWDS. There will be individualized services provided to guide the ABAWD from one activity to the next. There will also be case management provided to ensure progression and that they are meeting the work activity requirements. Regulations at 7 CFR 273.24(a) provide that fulfilling the work requirement means:

• Working 20 hours or more per week, averaged monthly to 80 hours;

- Participating in and complying with the requirements of a work program for 20 hours a week or more;
- Any combination of working and participating in a work program for a total of 20 hours per week; or

(link is external)

• Participating in and complying with the requirements of a workfare program.

Workfare is an E&T component for ABAWDS (non-exempt and living in non-waived county) to fulfill their work requirement to continue receiving their SNAP benefits beyond the three countable months in thirty-six months. The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value in their community.

Workfare hourly requirements are determined by utilizing the Fair Labor Standards Act (FLSA) and are equivalent to household benefits divided by the Oregon minimum wage. Oregon has three official minimum wage tiers, administered based on geographic areas. DHS has devised a calculator for each county based on the minimum wage tier that it falls into. This ensures that participants do not exceed the number of hours that are equivalent to their benefits divided by the official Oregon minimum wage for their geographic area. Information about Oregon's minimum wage system is available at this link: http://www.oregon.gov/boli/WHD/OMW/Pages/Minimum-Wage-Rate-Summary.aspx

As allowed by 7 CFR §273.7 and §273.24, services from other sources will count toward SNAP E&T work requirements. Other sources include:

- Work services under Workforce Innovation and Opportunity Act (WIOA); and
- Work services under the Trade Adjustment Assistance (TAA).

For FFY 2020, Oregon will comply with the commitment to offer either a qualifying education, training, or workfare opportunity to every ABAWD participant (not exempted or living in a waived county) beginning with the first complete month allowing the state to receive a portion of the \$20 million used to reimburse state agencies for costs incurred in serving ABAWDS.

Oregon is seeking additional funding for costs incurred in serving ABAWDS subject to the threemonth time limit. We anticipate that many participants will be enrolled simultaneously in more than one activity and participate for more than one month. To support participants, transportation and other necessary and related support service costs will be available to ABAWDS every month they are enrolled and participating in a component activity.

Oregon estimates spending approximately \$468.98 monthly for each non-exempt ABAWD in non-waived counties which translates to approximately \$3,894,367.72.

The additional funding is needed to ensure that qualifying work activities are offered.

For FFY 2020, Oregon will continue to provide structured components to ABAWDS through referral to OED. OED will work with the participant to utilize the array of E&T providers for ABAWD's to meet their work-related activities requirements.

Components for these areas are as follows:

- Supervised Job Search
- Job Search Training
- Job Retention

- Basic Education/Foundational Skills Instruction
- Career/Technical Education or other Vocational Training
- English Language Acquisition
- Integrated Education and Training/Bridge Program
- Work Readiness
- Self-Employment Training
- On-the-job Training
- Pre-Apprenticeship/Apprenticeship
- Internship
- Work Experience

## Supervised Job Search:

Description: Participants who are work ready (as determined by assessment), recently unemployed, or need assistance with job search will be referred to this component. Supervised job search must have a case plan that includes oversight, tracking, review, and assessment, as well as providing regular, or at least one time per month, check-ins or meetings to report on the job search progress or to adjust the case plan. All services must be provided in a state approved location.

ABAWDS (non-exempt and those in non-waived counties): Supervised Job Search activities cannot exceed nine hours per week and must be combined with other work-related activities to equal twenty hours per week. However, if the ABAWD is participating in job search through a WIOA program/activities or in the 30 days prior to the start of workfare, they can exceed 9 hours per weekly. Participants will submit their job contact forms to OED weekly for tracking participation.

STEP: Supervised Job Search activities within this program vary, depending upon the targeted audience and provider.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers		Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
,		SNAP recipients who are homeless or formerly homeless	60	\$28,398.00
Dress for Success	Portland Metro	Female SNAP recipients	50	\$59,700.79
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	38	\$9,291.71
Outside In		SNAP Recipients-Homeless Youth	15	\$577.45
Portland State University		SNAP Recipients-Students enrolled full time or part time	10	\$1,448.80
Stone Soup		SNAP Recipients at risk of homelessness	3	\$3,170.90
Dress for Success	Salem Metro	Female SNAP recipients	41	\$20,921.62
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	30	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	2	\$571.00
Goodwill Industries-Lane County	Lane County	Veterans, disadvantaged and disabled SNAP recipients	208	\$17,839.48
Lane County Health and Human Services		SNAP recipients who are unstably housed or homeless	13	\$6,052.68
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	9	\$1,741.66
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	32	\$5,072.00
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	18	\$8,328.89
Maslow	-	SNAP recipients who are unstably housed or homeless	2	\$2,919.90

	Klamath County	Veterans, disadvantaged and	11	\$1,979.17
Oregon Goodwill	-	disabled SNAP recipients	-	
Klamath Works, Inc.	Lake and Klamath County	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	31	\$15,869.33
Institute	Crook, Deschutes, Jefferson, Baker, Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	4	\$2,771.87
· ·	Clackamas, Multnomah, Marion, Washington	SNAP Recipients-Underserved youth	15	\$2,513.50
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	36	\$6,508.06
Home Plate	Washington County	SNAP recipients-Homeless Youth	6	\$1,294.11
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	304	\$93,708.92
Oregon Employment Department- STEP	Statewide	SNAP Recipients	993	\$635,900.00
Community College Consortia	Throughout state	SNAP Recipients	44	\$19,667.71

## Job Search Training:

Description: A component that strives to enhance the job search skills of participants by providing instruction in job seeking techniques and increasing motivation and self-confidence. The component may consist of job skills assessments, job placement services, or other direct training or support activities. Other activities may include resume writing workshops and learning how to use online job search tools. The job search training component may combine job search activities with other training and support activities.

ABAWD: Job Search Training may include resume writing workshops, interviewing workshops, and more training related to Job Search. Job Search Training activities cannot exceed nine hours per week and must be combined with other work-related activities to equal twenty hours per week unless the ABAWD is participating through a WIOA program.

STEP: Job Search Training activities within this program vary, depending upon the targeted audience and providers.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Central City Concern	Multnomah County, Clackamas County	SNAP recipients who are homeless or formerly homeless	70	\$28,397.60
Dress for Success	Portland Metro	Female SNAP recipients	10	\$13,954.91
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	9	\$2,144.24
Outside In	Multnomah County	SNAP Recipients- Homeless Youth	20	\$975.50
Portland State University	Portland Metro	SNAP Recipients-Students enrolled full time or part time	10	\$1,448.80
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	36	\$3,170.90
Dress for Success	Salem Metro	Female SNAP recipients	9	\$9,509.82
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	15	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	4	\$1,816.86
Goodwill Industries-Lane County	Lane County	Veterans, disadvantaged and disabled SNAP recipients	60	\$5,146.00
Lane County Health and Human Services	Lane County	SNAP recipients who are unstably housed or homeless	8	\$3,362.60
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	4	\$634.00
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	1	\$1,751.94

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Klamath Works, Inc.	Lake and Klamath County	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	15	\$12,060.70
Baker Technical	Crook, Deschutes,	SNAP Recipients	4	\$2,771.87
Institute	Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	· · · ·		
Leadership Lab	Clackamas, Multnomah, Marion, Washington	SNAP Recipients- Underserved youth	15	\$11,450.40
Clackamas	Clackamas County	SNAP Recipients	7	\$8,642.54
County Children, Family & Community Connections	-			
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	448	\$138,741.00
Work Systems	Clackamas, Clatsop,	SNAP Recipients	64	\$27,206.46
Inc Oregon Work Experience	Columbia, Tillamook, Linn, Marion, Polk, Yamhill, Multnomah, Washington, Hood River, Wasco, Sherman, Gilliam, Wheeler, Jefferson, Crook, Deschutes, Klamath, Lake, Coos, Douglas, Curry Counties			
Centro Cultural	Washington County	Spanish speaking or	7	\$1,220.26
De Condado De Washington		bilingual SNAP Recipients		
Home Plate	Washington County	SNAP recipients-Homeless Youth	7	\$2,588.21
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	243	\$93,708.90

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Oregon Employment Department- STEP	Statewide	SNAP Recipients	993	\$635,900.00
Community College Consortia	Throughout state	SNAP Recipients	95	\$42,531.07

# Job Retention:

Description: Services provided to E&T participants who have secured employment after participating in another E&T component, are no longer participating in another E&T component, and are no longer receiving SNAP benefits. This component is meant to help achieve satisfactory performance, retain employment, or to increase earnings over time. The participant may receive up to 90 days of job retention services. The 90 days begins when the SNAP benefits end. If a participant becomes employed and is still receiving SNAP benefits, services must be provided under a component other than retention.

# ABAWD: Offered statewide to assist ABAWDS in retaining employment and increasing earning potential.

*STEP:* Most STEP providers in Oregon offer this component as a part of their program and collaborate with other STEP providers to ensure that the participant is receiving the most comprehensive Job Retention Services.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers		Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
		SNAP recipients who are homeless or formerly homeless	50	\$14,198.97
Dress for Success	Portland Metro	Female SNAP recipients	7	\$7,256.55
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	8	\$1,906.00
Outside In	Multnomah County	SNAP Recipients-Homeless Youth	2	\$737.44
Portland State University		SNAP Recipients-Students enrolled full time or part time	10	\$1,448.80

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Dress for	Salem Metro	Female SNAP recipients	8	\$4,945.11
Success	-			
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	15	\$1,881.46
Youth	Lincoln County	SNAP Recipients- Ages 18-24	10	\$415.28
Development Coalition of Lincoln County				
Lane County	Lane County	SNAP recipients who are	6	\$1,569.21
Health and Human Services		unstably housed or homeless	-	
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	4	\$1,227.08
Goodwill	Curry and Coos	Veterans, disadvantaged and	8	\$3,811.53
Industries of Lane		disabled SNAP recipients		
&South Coast Counties	-			
Maslow	Josephine and	SNAP recipients who are	1	\$1,167.96
	Jackson County	unstably housed or homeless		
Southern Oregon	Klamath County	Veterans, disadvantaged and	5	\$791.67
Goodwill		disabled SNAP recipients	0	<i>Q</i> o nor
			10	<b>\$9.252.00</b>
Klamath Works, Inc.	County	SNAP participants who are transitioning from drug/alcohol	10	\$8,252.00
	County	treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	_	
Baker Technical	Crook, Deschutes,	SNAP Recipients	2	\$1,187.94
Institute	Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties			
Leadership Lab	Clackamas, Multnomah, Marion, Washington	SNAP Recipients-Underserved youth	15	\$2,513.50
Clackamas County Children,	Clackamas County	SNAP Recipients	3	\$2,304.68
Family &				

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Community Connections	_			
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	29	\$40,464.17
Centro Cultural De Condado De Washington*	Washington County	Spanish speaking or bilingual SNAP Recipients	5	\$903.90
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	54	\$46,854.46
Oregon Employment Department- STEP	Statewide	SNAP Recipients	350	\$141,311.09
Community College Consortia	Throughout state	SNAP Recipients	12	\$8,791.53

# **Education Components:**

The Food and Nutrition Act of 2008 prohibits State agencies from supplanting State education costs with Federal E&T funds. Only educational components that establish a direct link to job-readiness will be approved, although programs that involved articulated career pathways or stackable credentials that ultimately lead to employment are encouraged.

Oregon's E&T funds will only be used for education/training if:

- Federal funds are not used to supplant other funding;
- The provider and/or individual has attempted to secure federal assistance (not including loans) such as the Pell Grant, and such funds are not available; and
- The education costs are associated with E&T program engagement.

Oregon will not authorize expenses for operating educational/training components that exceed the normal costs of services provided to persons *not participating* in SNAP E&T programs and educational expenses will not be paid for training/education that is normally available to the public at no cost.

Oregon's providers offer several categories of services within the education component. These are:

- Basic Education/Foundational Skills Instruction
- Career/Technical Education or other Vocational Training

- English Language Acquisition
- Integrated Education and Training/Bridge Program
- Work Readiness

# **Basic Education / Foundational Skills Instruction:**

Description: Programs that offer academic instruction and education services below the postsecondary level that increase an individual's ability to read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent; transition to postsecondary education and training; and obtain employment. Such programs include Adult Basic Education (ABE), basic literacy, and high school equivalency (GED, TASC, HiSET, or other).

ABAWD: Educational activities are provided when they will directly enhance the participant's employability in a field with anticipated workforce shortages and may include GED testing and preparation, as well as basic literacy classes. This component is available for participants over age 21.

*STEP:* Several STEP providers have basic education components. They offer 1:1 assistance to the participant as they prepare for the ABE/GED required tests. They provide enhanced services in the form of direct tutoring/coaching which is not available to the general public. This component can be completed in conjunction with another component, such as supervised job search.

Reporting Measure(s) if >100 participants per year:

Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T

Providers	Geographic area	homeless, re-entry	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	11	\$2,620.74
Outside In	Multnomah County	SNAP Recipients- Homeless Youth	8	\$1,334.12
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	15	\$4,703.65
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	2	\$467.19
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	5	\$141.17
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	1	\$1,167.96

Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	1	\$1,979.91
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	3	\$451.95
Home Plate	Washington County	SNAP recipients- Homeless Youth	6	\$1,294.11
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	11	\$2,500.00
Oregon Employment Department-STEP	Statewide	SNAP Recipients	100	\$15,917.00
Community College Consortia	Throughout state	SNAP Recipients	160	\$116,644.85

# Career / Technical Education or Other Vocational Training:

Description: Organized activities at the post-secondary level that provide individuals with the academic and technical knowledge and skills necessary to prepare for further education and for careers in current or emerging employment sectors. Programs are primarily designed for those who are beyond the age of compulsory high school attendance. Ideally, such programs should be employer-driven and could lead to industry-recognized certificates or credentials.

ABAWD: This component is offered depending upon geographic region and available resources. OED refers ABAWD participants to STEP providers offering Career/Technical Education or Other Vocational Training, and will be given support service funding to assist participants in the training costs.

STEP: Several STEP providers provide participants with multiple options for certificate programs such as CNA, Flagging, Pesticide Certification, Master Gardner Certification, Food Handler's training, and Oregon Liquor Control Certification. The participants are coached through their training with enhanced case management.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4th quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Dress for Success	Portland Metro	Female SNAP recipients	8	\$3,907.37

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	4	\$953.00
Outside In	Multnomah County	SNAP Recipients- Homeless Youth	7	\$2,581.03
Portland State University	Portland Metro	SNAP Recipients-Students enrolled full time or part time	44	\$3,622.00
Dress for Success	Salem Metro	Female SNAP recipients	5	\$2,662.75
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	30	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	30	\$778.65
Food for Lane	Lane County	SNAP recipients	16	\$8,003.55
Goodwill Industries-Lane County	Lane County	Veterans, disadvantaged and disabled SNAP recipients	10	\$857.66
Lane County Health and Human Services	Lane County	SNAP recipients who are unstably housed or homeless	2	\$11,432.80
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	2	\$1,227.08
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	2	\$317.00
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	2	\$988.17
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	10	\$1,167.96
Southern Oregon Goodwill	Klamath County	Veterans, disadvantaged and disabled SNAP recipients	2	\$593.75

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Klamath Works, Inc.	Lake and Klamath County	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	7	\$3,173.88
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	5	\$27,718.70
Clackamas County Children, Family & Community Connections	Clackamas County	SNAP Recipients	4	\$576.17
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	43	\$36,257.10
Work Systems Inc Oregon Work Experience	Clackamas, Clatsop, Columbia, Tillamook, Linn, Marion, Polk, Yamhill, Multnomah, Washington, Hood River, Wasco, Sherman, Gilliam, Wheeler, Jefferson, Crook, Deschutes, Klamath, Lake, Coos, Douglas, Curry Counties	SNAP Recipients	41	\$17,394.29
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	44	\$7,954.30
Home Plate	Washington County	SNAP recipients-Homeless Youth	7	\$3,623.50
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	44	\$3,750.00
Oregon Employment	Statewide	SNAP Recipients	400	\$212,222.64

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Department- STEP				
Community College Consortia	Throughout state	SNAP Recipients	396	\$290,685.99

# English Language Acquisition:

Description: A component designed to help English language learners achieve competence in reading, writing, speaking, and comprehension of the English language.

ABAWD: This component is offered depending participant need and availability. Participants attend short-term ELA training as a component of their case plan.

STEP: Oregon's STEP providers work with participants to determine the case plan that will assist with the components needed to gain employment. The STEP providers listed below have an identified ELA program. (Note: Most STEP providers refer participants to needed ESL courses and some have included this in their participant numbers/program costs under Basic Education.)

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re- entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	1	\$362.20
Sparrow Furniture	Salem Metro	SNAP Recipients – resettled refugee and asylees	7	\$3,300.84
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP Recipients	6	\$940.73
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker, Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	3	\$791.96
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	3	\$4,519.49
Home Plate	Washington County	SNAP recipients- Homeless Youth	4	\$258.82
Oregon Employment	Statewide	SNAP Recipients	11	\$1,250.00

Providers	Geographic area	Target audience (e.g., homeless, re- entry population, ABAWDS)		Anticipated monthly cost
Department-				
ABAWD				
Oregon	Statewide	SNAP Recipients	100	\$70,740.88
Employment				
Department-STEP				
Community	Throughout state	SNAP Recipients	71	\$37,890.69
College Consortia				

# Integrated Education and Training/Bridge Programs:

Description: Programs that provide adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or group of occupations for the purpose of educational and career advancement.

Reporting Measure(s) if >100 participants per year:

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	3	\$724.40
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP Recipients	15	\$14,110.94
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	10	\$415.28
Community College Consortia	Throughout state	SNAP Recipients	54	\$57,936.75

# Work Readiness Training:

Description: Intensive programs that include skill assessment and educational remediation services that prepare individuals for the workforce. Work readiness skills may include both foundational cognitive skills such as reading for information, applied mathematics, locating information, problem solving, and critical thinking and non-cognitive skills, or soft skills, which are defined as personal characteristics and behavioral skills that enhance an individual's interactions, job performance, and career prospects such as adaptability, integrity, cooperation, and workplace discipline.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Outside In	Multnomah County	SNAP Recipients – Homeless Youth	10	\$3,687.14
Portland State University	Portland Metro	SNAP Recipients	2	\$724.40
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP Recipients	15	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	2	\$415.28
Klamath Works, Inc	Lake and Klamath Counties	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	23	\$22,217.13
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	5	\$1,187.94
Clackamas Workforce Partnership*	Clackamas County	SNAP Recipients	8	\$7,859.67
Leadership Lab	Clackamas, Multnomah, Marion, Washington	SNAP Recipients-Underserved youth	15	\$11,450.38

# Work Components:

- On-the-Job Training (OJT)
- Self-Employment Training
- Pre-Apprenticeships and Apprenticeships
- Internship Programs
- Workfare
- Work Experience

# On-the-Job Training (OJT):

Description: A work placement made through a contract with an employer or registered apprenticeship program sponsor in the public, private non-profit, or private sector. An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's individual employment plan

Reporting Measure(s) if >100 participants per year: N/A

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	5	\$1,448.80
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	3	\$940.73

### Self-Employment Training:

Description: A component that improves the employability of participants by providing training in setting-up and operating a small business or other self-employment venture.

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	2	\$181.10
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$4,703.65
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	3	\$311.46

# **Pre-Apprenticeships and Apprenticeships**

**Description:** A combination of on-the-job training and related instruction in which workers learn the practical and theoretical aspects of a skilled occupation. Apprenticeship programs can be sponsored by individual employers, joint employer and labor groups, and/or employer associations. Pre-Apprenticeship programs provide individuals with the basic and technical skills necessary to enter an apprenticeship program and should be directly linked to an apprenticeship program.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Outside In	Multnomah County	SNAP Recipients – Homeless Youth	2	\$97.55
Sparrow Furniture	Salem Metro	SNAP Recipients – resettled refugee and asylees	21	\$29,707.67
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$940.73
Klamath Works, Inc	Counties	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	2	\$1,269.55
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	28	\$35,056.92
Home Plate	Washington County	SNAP recipients-Homeless Youth	3	\$1,294.10
Community College Consortia	Throughout state	SNAP Recipients	17	\$22,850.06

# Internship:

Description: A planned, structured learning experience that takes place in a workplace for a limited period of time.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	homeless, re-entry	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	10	\$1,448.80
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	3	\$3,170.90

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$9,407.29
Home Plate	Washington County	SNAP recipients- Homeless Youth	3	\$3,588.21
Community College Consortia	Throughout state	SNAP Recipients	35	\$16,864.82

# Work Experience:

Description:

A work component designed to improve the employability of participants through actual work experience and/or training. Work experience assignments may not replace the employment of a regularly employed individual, and they must provide the same benefits and working conditions provided to regularly employed individuals performing comparable work for comparable hours. It is permissible to place E&T participants in work experience positions with private sector entities. In Oregon, this component is only offered for STEP participants who are non-ABAWD or ABAWD exempt.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Central City	Multnomah County,	SNAP recipients who are	615	\$86,771.30
Concern	Clackamas County	homeless or formerly homeless		
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17- 24)	9	\$6,909.22
Outside In	Multnomah County	SNAP Recipients-Homeless Youth	45	\$5,497.00
Portland State University	Portland Metro	SNAP Recipients	5	\$1,448.80
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	3	\$23,613.00
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$18,814.58
Goodwill Industries of	Lane County	Veterans, disadvantaged and disabled SNAP recipients	3	\$257.30

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Lane &South Coast Counties	-			
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	6	\$79.25
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	2	\$7,764.22
Southern Oregon Goodwill	Klamath County	Veterans, disadvantaged and disabled SNAP recipients	1	\$593.75
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	5	\$197.92
Klamath Works, Inc	Lake and Klamath Counties	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	15	\$8,252,08
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	10	\$1,187.94
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	8	\$6,459.71
Centro Cultural De Condado De Washington		Spanish speaking or bilingual SNAP Recipients	2	\$4,338.71
Community College Consortia	Throughout state	SNAP Recipients	5	\$4,195.47

Workfare (for non-exempt ABAWDS in non-waived counties only)

# Workfare:

Description: A work component in which SNAP recipients perform work in a public service capacity as a condition of eligibility. In lieu of wages, workfare participants receive compensation in the form of their household's monthly coupon allotment. The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value to the community. Only ABAWD's who reside in non-waived counties may participate in workfare.

Oregon has the sole responsibility of establishing Workfare sites. They must be a private or public non-profit agency serving in a public service capacity.

Oregon is also currently contracting with the Oregon Food Bank (OFB) to provide services across the state. Within the contract, OFB and other Workfare partner sites will have oversight of worksite placements and agreements. OFB will report quarterly on the required outcomes to DHS. In addition, other organizations, in the counties subject to the time limits, have been approved to be included as workfare sites.

OED, as the statewide ABAWD provider, has data sharing agreements and an MOU with all approved Workfare partners. They are responsible for referring ABAWD participants to their sites.

DHS will determine the workfare hours. In Oregon, the maximum number of hours that are required (and allowed) of an ABAWD each month is determined by dividing the household's SNAP benefit allotment by the State minimum wage. This is then divided by four to get the maximum weekly hours, rounding down if needed. As of 7/1/17, we have three official State minimum wage tiers. Link to Oregon wage rate information: http://www.oregon.gov/boli/WHD/OMW/Pages/Minimum-Wage-Rate-Summary.aspx

(link is external)

FLSA is calculated by using the minimum wage where the workfare position is performed. If a participant meets the FLSA level of participation in workfare, they do not need to participate in other activities to continue getting their SNAP benefits beyond three months.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Benton Habitat for Humanity	Benton County	ABAWDS	10	\$0.00
Bethlehem House of Bread*	Washington County	ABAWDS	TBD	\$0.00
Catholic Community Charities*	Marion County	ABAWDS	20	\$0.00
Clackamas Service Center*	Clackamas County	ABAWDS	8	\$0.00
Clay Street Table*	Multnomah	ABAWDS	6	\$0.00
EMO NE Emergency Food Program*	Multnomah	ABAWDS	6	\$0.00

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Forest Grove Assembly of God Church*	Washington County	ABAWDS	3	\$0.00
Good Roots Community Church Food Pantry*	Clackamas County	ABAWDS	4	\$0.00
HOPE First Baptist Church Food Pantry*	Clackamas County	ABAWDS	TBD	\$0.00
Marion Polk Food Share*	Marion County	ABAWDS	10	\$0.00
Neighborhood House Food Pantry*	Multnomah	ABAWDS	20	\$0
Oregon Food Bank	Multnomah and Washington Counties	ABAWDS	50	\$9,012.66
SnowCap Community Charities*	Multnomah	ABAWDS	4	\$0
Tualatin Schoolhouse Pantry*	Washington County	ABAWDS	3	\$0.00
Wilsonville Community Sharing*	Clackamas County	ABAWDS	5	\$0.00

\*Affiliate of Oregon Food Bank

# 5. Information about the size and special needs of its ABAWD population; and

Oregon pledges to offer a qualifying activity to each at-risk ABAWD applicant or recipient (not exempted or in a waived county) beginning with the first complete month of eligibility. Non-exempt and non-waived ABAWDS are not eligible to receive SNAP benefits for more than three months in a 36-month period unless the individual meets the work requirement.

Oregon has elected to have a statewide contract for ABAWD services. OED has been selected to be this provider. This will ensure consistent and qualifying services are provided to all at-risk ABAWDS. Due to limited funding provided through the ABAWD Pledge funds, contracting with OED allows for leveraging of services provided as part of the STEP contracts.

The qualifying services provided by OED, while consistent with the services provided to the general population, will be at an enhanced or expanded capacity for the at-risk ABAWDS. There will be individualized services provided to guide the ABAWD from one activity to the next. There will also be case management provided to ensure progression and that they are meeting the work activity requirements. Regulations at 7 CFR 273.24(a) provide that fulfilling the work requirement means:

- Working 20 hours or more per week, averaged monthly to 80 hours;
- Participating in and complying with the requirements of a work program for 20 hours a week or more;

• Any combination of working and participating in a work program for a total of 20 hours per week; or

(link is external)

• Participating in and complying with the requirements of a workfare program.

Workfare is an E&T component for ABAWDS (non-exempt and living in non-waived county) to fulfill their work requirement to continue receiving their SNAP benefits beyond the three countable months in thirty-six months. The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value in their community.

Workfare hourly requirements are determined by utilizing the Fair Labor Standards Act (FLSA) and are equivalent to household benefits divided by the Oregon minimum wage. Oregon has three official minimum wage tiers, administered based on geographic areas. DHS has devised a calculator for each county based on the minimum wage tier that it falls into. This ensures that participants do not exceed the number of hours that are equivalent to their benefits divided by the official Oregon minimum wage for their geographic area. Information about Oregon's minimum wage system is available at this link: http://www.oregon.gov/boli/WHD/OMW/Pages/Minimum-Wage-Rate-Summary.aspx

As allowed by 7 CFR §273.7 and §273.24, services from other sources will count toward SNAP E&T work requirements. Other sources include:

- Work services under Workforce Innovation and Opportunity Act (WIOA); and
- Work services under the Trade Adjustment Assistance (TAA).

For FFY 2020, Oregon will comply with the commitment to offer either a qualifying education, training, or workfare opportunity to every ABAWD participant (not exempted or living in a waived county) beginning with the first complete month allowing the state to receive a portion of the \$20 million used to reimburse state agencies for costs incurred in serving ABAWDS.

Oregon is seeking additional funding for costs incurred in serving ABAWDS subject to the threemonth time limit. We anticipate that many participants will be enrolled simultaneously in more than one activity and participate for more than one month. To support participants, transportation and other necessary and related support service costs will be available to ABAWDS every month they are enrolled and participating in a component activity.

Oregon estimates spending approximately \$468.98 monthly for each non-exempt ABAWD in non-waived counties which translates to approximately \$3,894,367.72.

The additional funding is needed to ensure that qualifying work activities are offered.

For FFY 2020, Oregon will continue to provide structured components to ABAWDS through referral to OED. OED will work with the participant to utilize the array of E&T providers for ABAWD's to meet their work-related activities requirements.

Components for these areas are as follows:

- Supervised Job Search
- Job Search Training
- Job Retention
- Basic Education/Foundational Skills Instruction

- Career/Technical Education or other Vocational Training
- English Language Acquisition
- Integrated Education and Training/Bridge Program
- Work Readiness
- Self-Employment Training
- On-the-job Training
- Pre-Apprenticeship/Apprenticeship
- Internship
- Work Experience

# Supervised Job Search:

Description: Participants who are work ready (as determined by assessment), recently unemployed, or need assistance with job search will be referred to this component. Supervised job search must have a case plan that includes oversight, tracking, review, and assessment, as well as providing regular, or at least one time per month, check-ins or meetings to report on the job search progress or to adjust the case plan. All services must be provided in a state approved location.

ABAWDS (non-exempt and those in non-waived counties): Supervised Job Search activities cannot exceed nine hours per week and must be combined with other work-related activities to equal twenty hours per week. However, if the ABAWD is participating in job search through a WIOA program/activities or in the 30 days prior to the start of workfare, they can exceed 9 hours per weekly. Participants will submit their job contact forms to OED weekly for tracking participation.

STEP: Supervised Job Search activities within this program vary, depending upon the targeted audience and provider.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers		Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
,		SNAP recipients who are homeless or formerly homeless	60	\$28,398.00
Dress for Success	Portland Metro	Female SNAP recipients	50	\$59,700.79
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	38	\$9,291.71
Outside In		SNAP Recipients-Homeless Youth	15	\$577.45
Portland State University		SNAP Recipients-Students enrolled full time or part time	10	\$1,448.80
Stone Soup		SNAP Recipients at risk of homelessness	3	\$3,170.90
Dress for Success	Salem Metro	Female SNAP recipients	41	\$20,921.62
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	30	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	2	\$571.00
Goodwill Industries-Lane County	Lane County	Veterans, disadvantaged and disabled SNAP recipients	208	\$17,839.48
Lane County Health and Human Services		SNAP recipients who are unstably housed or homeless	13	\$6,052.68
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	9	\$1,741.66
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	32	\$5,072.00
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	18	\$8,328.89
Maslow	-	SNAP recipients who are unstably housed or homeless	2	\$2,919.90

Southern Oregon	Klamath County	Veterans, disadvantaged and disabled SNAP recipients	11	\$1,979.17
Goodwill	-			
	Lake and Klamath County SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.		31	\$15,869.33
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker, Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	4	\$2,771.87
Leadership Lab	Clackamas, Multnomah, Marion, Washington	SNAP Recipients-Underserved youth	15	\$2,513.50
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	36	\$6,508.06
Home Plate	Washington County	SNAP recipients-Homeless Youth	6	\$1,294.11
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	304	\$93,708.92
Oregon Employment Department- STEP	Statewide	SNAP Recipients	993	\$635,900.00
Community College Consortia	Throughout state	SNAP Recipients	44	\$19,667.71

# Job Search Training:

Description: A component that strives to enhance the job search skills of participants by providing instruction in job seeking techniques and increasing motivation and self-confidence. The component may consist of job skills assessments, job placement services, or other direct training or support activities. Other activities may include resume writing workshops and learning how to use online job search tools. The job search training component may combine job search activities with other training and support activities.

ABAWD: Job Search Training may include resume writing workshops, interviewing workshops, and more training related to Job Search. Job Search Training activities cannot exceed nine hours per week and must be combined with other work-related activities to equal twenty hours per week unless the ABAWD is participating through a WIOA program.

STEP: Job Search Training activities within this program vary, depending upon the targeted audience and providers.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Central City Concern	Multnomah County, Clackamas County	SNAP recipients who are homeless or formerly homeless	70	\$28,397.60
Dress for Success	Portland Metro	Female SNAP recipients	10	\$13,954.91
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	9	\$2,144.24
Outside In	Multnomah County	SNAP Recipients- Homeless Youth	20	\$975.50
Portland State University	Portland Metro	SNAP Recipients-Students enrolled full time or part time	10	\$1,448.80
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	36	\$3,170.90
Dress for Success	Salem Metro	Female SNAP recipients	9	\$9,509.82
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	15	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	4	\$1,816.86
Goodwill Industries-Lane County	Lane County	Veterans, disadvantaged and disabled SNAP recipients	60	\$5,146.00
Lane County Health and Human Services	Lane County	SNAP recipients who are unstably housed or homeless	8	\$3,362.60
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	4	\$634.00
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	1	\$1,751.94

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Klamath Works, Inc.	Lake and Klamath County	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	15	\$12,060.70
Baker Technical	Crook, Deschutes,	SNAP Recipients	4	\$2,771.87
Institute	Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	· · · ·		
Leadership Lab	Clackamas, Multnomah, Marion, Washington	SNAP Recipients- Underserved youth	15	\$11,450.40
Clackamas	Clackamas County	SNAP Recipients	7	\$8,642.54
County Children, Family & Community Connections	-			
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	448	\$138,741.00
Work Systems	Clackamas, Clatsop,	SNAP Recipients	64	\$27,206.46
Inc Oregon Work Experience	Columbia, Tillamook, Linn, Marion, Polk, Yamhill, Multnomah, Washington, Hood River, Wasco, Sherman, Gilliam, Wheeler, Jefferson, Crook, Deschutes, Klamath, Lake, Coos, Douglas, Curry Counties			
Centro Cultural	Washington County	Spanish speaking or	7	\$1,220.26
De Condado De Washington		bilingual SNAP Recipients		
Home Plate	Washington County	SNAP recipients-Homeless Youth	7	\$2,588.21
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	243	\$93,708.90

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Oregon Employment Department- STEP	Statewide	SNAP Recipients	993	\$635,900.00
Community College Consortia	Throughout state	SNAP Recipients	95	\$42,531.07

# Job Retention:

Description: Services provided to E&T participants who have secured employment after participating in another E&T component, are no longer participating in another E&T component, and are no longer receiving SNAP benefits. This component is meant to help achieve satisfactory performance, retain employment, or to increase earnings over time. The participant may receive up to 90 days of job retention services. The 90 days begins when the SNAP benefits end. If a participant becomes employed and is still receiving SNAP benefits, services must be provided under a component other than retention.

# ABAWD: Offered statewide to assist ABAWDS in retaining employment and increasing earning potential.

*STEP:* Most STEP providers in Oregon offer this component as a part of their program and collaborate with other STEP providers to ensure that the participant is receiving the most comprehensive Job Retention Services.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers		Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
		SNAP recipients who are homeless or formerly homeless	50	\$14,198.97
Dress for Success	Portland Metro	Female SNAP recipients	7	\$7,256.55
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	8	\$1,906.00
Outside In	Multnomah County	SNAP Recipients-Homeless Youth	2	\$737.44
Portland State University		SNAP Recipients-Students enrolled full time or part time	10	\$1,448.80

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Dress for	Salem Metro	Female SNAP recipients	8	\$4,945.11
Success	-			
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	15	\$1,881.46
Youth	Lincoln County	SNAP Recipients- Ages 18-24	10	\$415.28
Development Coalition of Lincoln County	-			
Lane County	Lane County	SNAP recipients who are	6	\$1,569.21
Health and Human Services	-	unstably housed or homeless	-	
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	4	\$1,227.08
Goodwill	Curry and Coos	Veterans, disadvantaged and	8	\$3,811.53
Industries of Lane		disabled SNAP recipients		
&South Coast Counties	-		_	
Maslow	Josephine and	SNAP recipients who are	1	\$1,167.96
	Jackson County	unstably housed or homeless		
Southern Oregon	Klamath County	Veterans, disadvantaged and	5	\$791.67
Goodwill		disabled SNAP recipients	0	<i><i><i>ϕ</i>iϕiqiϕiqiqiqiqiqiqiq<i></i></i></i>
Klamath Warks	Lake and Klameth		10	¢9.252.00
Klamath Works, Inc.	County	SNAP participants who are transitioning from drug/alcohol	10	\$8,252.00
		treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	_	
Baker Technical	Crook, Deschutes,	SNAP Recipients	2	\$1,187.94
Institute	Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	-		
Leadership Lab	Clackamas, Multnomah, Marion, Washington	SNAP Recipients-Underserved youth	15	\$2,513.50
Clackamas County Children, Family &	Clackamas County	SNAP Recipients	3	\$2,304.68

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Community Connections	_			
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	29	\$40,464.17
Centro Cultural De Condado De Washington*	Washington County	Spanish speaking or bilingual SNAP Recipients	5	\$903.90
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	54	\$46,854.46
Oregon Employment Department- STEP	Statewide	SNAP Recipients	350	\$141,311.09
Community College Consortia	Throughout state	SNAP Recipients	12	\$8,791.53

# **Education Components:**

The Food and Nutrition Act of 2008 prohibits State agencies from supplanting State education costs with Federal E&T funds. Only educational components that establish a direct link to job-readiness will be approved, although programs that involved articulated career pathways or stackable credentials that ultimately lead to employment are encouraged.

Oregon's E&T funds will only be used for education/training if:

- Federal funds are not used to supplant other funding;
- The provider and/or individual has attempted to secure federal assistance (not including loans) such as the Pell Grant, and such funds are not available; and
- The education costs are associated with E&T program engagement.

Oregon will not authorize expenses for operating educational/training components that exceed the normal costs of services provided to persons *not participating* in SNAP E&T programs and educational expenses will not be paid for training/education that is normally available to the public at no cost.

Oregon's providers offer several categories of services within the education component. These are:

- Basic Education/Foundational Skills Instruction
- Career/Technical Education or other Vocational Training

- English Language Acquisition
- Integrated Education and Training/Bridge Program
- Work Readiness

# **Basic Education / Foundational Skills Instruction:**

Description: Programs that offer academic instruction and education services below the postsecondary level that increase an individual's ability to read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent; transition to postsecondary education and training; and obtain employment. Such programs include Adult Basic Education (ABE), basic literacy, and high school equivalency (GED, TASC, HiSET, or other).

ABAWD: Educational activities are provided when they will directly enhance the participant's employability in a field with anticipated workforce shortages and may include GED testing and preparation, as well as basic literacy classes. This component is available for participants over age 21.

*STEP:* Several STEP providers have basic education components. They offer 1:1 assistance to the participant as they prepare for the ABE/GED required tests. They provide enhanced services in the form of direct tutoring/coaching which is not available to the general public. This component can be completed in conjunction with another component, such as supervised job search.

Reporting Measure(s) if >100 participants per year:

Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T

Providers	Geographic area	homeless, re-entry	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	11	\$2,620.74
Outside In	Multnomah County	SNAP Recipients- Homeless Youth	8	\$1,334.12
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	15	\$4,703.65
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	2	\$467.19
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	5	\$141.17
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	1	\$1,167.96

Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	1	\$1,979.91
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	3	\$451.95
Home Plate	Washington County	SNAP recipients- Homeless Youth	6	\$1,294.11
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	11	\$2,500.00
Oregon Employment Department-STEP	Statewide	SNAP Recipients	100	\$15,917.00
Community College Consortia	Throughout state	SNAP Recipients	160	\$116,644.85

# Career / Technical Education or Other Vocational Training:

Description: Organized activities at the post-secondary level that provide individuals with the academic and technical knowledge and skills necessary to prepare for further education and for careers in current or emerging employment sectors. Programs are primarily designed for those who are beyond the age of compulsory high school attendance. Ideally, such programs should be employer-driven and could lead to industry-recognized certificates or credentials.

ABAWD: This component is offered depending upon geographic region and available resources. OED refers ABAWD participants to STEP providers offering Career/Technical Education or Other Vocational Training, and will be given support service funding to assist participants in the training costs.

STEP: Several STEP providers provide participants with multiple options for certificate programs such as CNA, Flagging, Pesticide Certification, Master Gardner Certification, Food Handler's training, and Oregon Liquor Control Certification. The participants are coached through their training with enhanced case management.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4th quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Dress for Success	Portland Metro	Female SNAP recipients	8	\$3,907.37

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	4	\$953.00
Outside In	Multnomah County	SNAP Recipients- Homeless Youth	7	\$2,581.03
Portland State University	Portland Metro	SNAP Recipients-Students enrolled full time or part time	44	\$3,622.00
Dress for Success	Salem Metro	Female SNAP recipients	5	\$2,662.75
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	30	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	30	\$778.65
Food for Lane	Lane County	SNAP recipients	16	\$8,003.55
Goodwill Industries-Lane County	Lane County	Veterans, disadvantaged and disabled SNAP recipients	10	\$857.66
Lane County Health and Human Services	Lane County	SNAP recipients who are unstably housed or homeless	2	\$11,432.80
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	2	\$1,227.08
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	2	\$317.00
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	2	\$988.17
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	10	\$1,167.96
Southern Oregon Goodwill	Klamath County	Veterans, disadvantaged and disabled SNAP recipients	2	\$593.75

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Klamath Works, Inc.	Lake and Klamath County	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	7	\$3,173.88
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	5	\$27,718.70
Clackamas County Children, Family & Community Connections	Clackamas County	SNAP Recipients	4	\$576.17
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	43	\$36,257.10
Work Systems Inc Oregon Work Experience	Clackamas, Clatsop, Columbia, Tillamook, Linn, Marion, Polk, Yamhill, Multnomah, Washington, Hood River, Wasco, Sherman, Gilliam, Wheeler, Jefferson, Crook, Deschutes, Klamath, Lake, Coos, Douglas, Curry Counties	SNAP Recipients	41	\$17,394.29
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	44	\$7,954.30
Home Plate	Washington County	SNAP recipients-Homeless Youth	7	\$3,623.50
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	44	\$3,750.00
Oregon Employment	Statewide	SNAP Recipients	400	\$212,222.64

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Department- STEP				
Community College Consortia	Throughout state	SNAP Recipients	396	\$290,685.99

# English Language Acquisition:

Description: A component designed to help English language learners achieve competence in reading, writing, speaking, and comprehension of the English language.

ABAWD: This component is offered depending participant need and availability. Participants attend short-term ELA training as a component of their case plan.

STEP: Oregon's STEP providers work with participants to determine the case plan that will assist with the components needed to gain employment. The STEP providers listed below have an identified ELA program. (Note: Most STEP providers refer participants to needed ESL courses and some have included this in their participant numbers/program costs under Basic Education.)

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re- entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	1	\$362.20
Sparrow Furniture	Salem Metro	SNAP Recipients – resettled refugee and asylees	7	\$3,300.84
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP Recipients	6	\$940.73
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker, Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	3	\$791.96
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	3	\$4,519.49
Home Plate	Washington County	SNAP recipients- Homeless Youth	4	\$258.82
Oregon Employment	Statewide	SNAP Recipients	11	\$1,250.00

Providers	Geographic area	Target audience (e.g., homeless, re- entry population, ABAWDS)		Anticipated monthly cost
Department-				
ABAWD				
Oregon	Statewide	SNAP Recipients	100	\$70,740.88
Employment				
Department-STEP				
Community	Throughout state	SNAP Recipients	71	\$37,890.69
College Consortia				

# Integrated Education and Training/Bridge Programs:

Description: Programs that provide adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or group of occupations for the purpose of educational and career advancement.

Reporting Measure(s) if >100 participants per year:

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	3	\$724.40
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP Recipients	15	\$14,110.94
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	10	\$415.28
Community College Consortia	Throughout state	SNAP Recipients	54	\$57,936.75

# Work Readiness Training:

Description: Intensive programs that include skill assessment and educational remediation services that prepare individuals for the workforce. Work readiness skills may include both foundational cognitive skills such as reading for information, applied mathematics, locating information, problem solving, and critical thinking and non-cognitive skills, or soft skills, which are defined as personal characteristics and behavioral skills that enhance an individual's interactions, job performance, and career prospects such as adaptability, integrity, cooperation, and workplace discipline.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Outside In	Multnomah County	SNAP Recipients – Homeless Youth	10	\$3,687.14
Portland State University	Portland Metro	SNAP Recipients	2	\$724.40
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP Recipients	15	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	2	\$415.28
Klamath Works, Inc	Lake and Klamath Counties	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	23	\$22,217.13
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	5	\$1,187.94
Clackamas Workforce Partnership*	Clackamas County	SNAP Recipients	8	\$7,859.67
Leadership Lab	Clackamas, Multnomah, Marion, Washington	SNAP Recipients-Underserved youth	15	\$11,450.38

# Work Components:

- On-the-Job Training (OJT)
- Self-Employment Training
- Pre-Apprenticeships and Apprenticeships
- Internship Programs
- Workfare
- Work Experience

# On-the-Job Training (OJT):

Description: A work placement made through a contract with an employer or registered apprenticeship program sponsor in the public, private non-profit, or private sector. An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's individual employment plan

Reporting Measure(s) if >100 participants per year: N/A

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	5	\$1,448.80
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	3	\$940.73

### Self-Employment Training:

Description: A component that improves the employability of participants by providing training in setting-up and operating a small business or other self-employment venture.

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	2	\$181.10
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$4,703.65
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	3	\$311.46

# **Pre-Apprenticeships and Apprenticeships**

**Description:** A combination of on-the-job training and related instruction in which workers learn the practical and theoretical aspects of a skilled occupation. Apprenticeship programs can be sponsored by individual employers, joint employer and labor groups, and/or employer associations. Pre-Apprenticeship programs provide individuals with the basic and technical skills necessary to enter an apprenticeship program and should be directly linked to an apprenticeship program.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Outside In	Multnomah County	SNAP Recipients – Homeless Youth	2	\$97.55
Sparrow Furniture	Salem Metro	SNAP Recipients – resettled refugee and asylees	21	\$29,707.67
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$940.73
Klamath Works, Inc	Counties	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	2	\$1,269.55
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	28	\$35,056.92
Home Plate	Washington County	SNAP recipients-Homeless Youth	3	\$1,294.10
Community College Consortia	Throughout state	SNAP Recipients	17	\$22,850.06

# Internship:

Description: A planned, structured learning experience that takes place in a workplace for a limited period of time.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	homeless, re-entry	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	10	\$1,448.80
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	3	\$3,170.90

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$9,407.29
Home Plate	Washington County	SNAP recipients- Homeless Youth	3	\$3,588.21
Community College Consortia	Throughout state	SNAP Recipients	35	\$16,864.82

# Work Experience:

Description:

A work component designed to improve the employability of participants through actual work experience and/or training. Work experience assignments may not replace the employment of a regularly employed individual, and they must provide the same benefits and working conditions provided to regularly employed individuals performing comparable work for comparable hours. It is permissible to place E&T participants in work experience positions with private sector entities. In Oregon, this component is only offered for STEP participants who are non-ABAWD or ABAWD exempt.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Central City	Multnomah County,	SNAP recipients who are	615	\$86,771.30
Concern	Clackamas County	homeless or formerly homeless		
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17- 24)	9	\$6,909.22
Outside In	Multnomah County	SNAP Recipients-Homeless Youth	45	\$5,497.00
Portland State University	Portland Metro	SNAP Recipients	5	\$1,448.80
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	3	\$23,613.00
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$18,814.58
Goodwill Industries of	Lane County	Veterans, disadvantaged and disabled SNAP recipients	3	\$257.30

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Lane &South Coast Counties	-			
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	6	\$79.25
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	2	\$7,764.22
Southern Oregon Goodwill	Klamath County	Veterans, disadvantaged and disabled SNAP recipients	1	\$593.75
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	5	\$197.92
Klamath Works, Inc	Lake and Klamath Counties	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	15	\$8,252,08
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	10	\$1,187.94
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	8	\$6,459.71
Centro Cultural De Condado De Washington		Spanish speaking or bilingual SNAP Recipients	2	\$4,338.71
Community College Consortia	Throughout state	SNAP Recipients	5	\$4,195.47

Workfare (for non-exempt ABAWDS in non-waived counties only)

# Workfare:

Description: A work component in which SNAP recipients perform work in a public service capacity as a condition of eligibility. In lieu of wages, workfare participants receive compensation in the form of their household's monthly coupon allotment. The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value to the community. Only ABAWD's who reside in non-waived counties may participate in workfare.

Oregon has the sole responsibility of establishing Workfare sites. They must be a private or public non-profit agency serving in a public service capacity.

Oregon is also currently contracting with the Oregon Food Bank (OFB) to provide services across the state. Within the contract, OFB and other Workfare partner sites will have oversight of worksite placements and agreements. OFB will report quarterly on the required outcomes to DHS. In addition, other organizations, in the counties subject to the time limits, have been approved to be included as workfare sites.

OED, as the statewide ABAWD provider, has data sharing agreements and an MOU with all approved Workfare partners. They are responsible for referring ABAWD participants to their sites.

DHS will determine the workfare hours. In Oregon, the maximum number of hours that are required (and allowed) of an ABAWD each month is determined by dividing the household's SNAP benefit allotment by the State minimum wage. This is then divided by four to get the maximum weekly hours, rounding down if needed. As of 7/1/17, we have three official State minimum wage tiers. Link to Oregon wage rate information: http://www.oregon.gov/boli/WHD/OMW/Pages/Minimum-Wage-Rate-Summary.aspx

(link is external)

FLSA is calculated by using the minimum wage where the workfare position is performed. If a participant meets the FLSA level of participation in workfare, they do not need to participate in other activities to continue getting their SNAP benefits beyond three months.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Benton Habitat for Humanity	Benton County	ABAWDS	10	\$0.00
Bethlehem House of Bread*	Washington County	ABAWDS	TBD	\$0.00
Catholic Community Charities*	Marion County	ABAWDS	20	\$0.00
Clackamas Service Center*	Clackamas County	ABAWDS	8	\$0.00
Clay Street Table*	Multnomah	ABAWDS	6	\$0.00
EMO NE Emergency Food Program*	Multnomah	ABAWDS	6	\$0.00

Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Washington County	ABAWDS	3	\$0.00
Clackamas County	ABAWDS	4	\$0.00
Clackamas County	ABAWDS	TBD	\$0.00
Marion County	ABAWDS	10	\$0.00
Multnomah	ABAWDS	20	\$0
Multnomah and Washington Counties	ABAWDS	50	\$9,012.66
Multnomah	ABAWDS	4	\$0
Washington County	ABAWDS	3	\$0.00
Clackamas County	ABAWDS	5	\$0.00
	Washington County Clackamas County Clackamas County Marion County Marion County Multnomah Multnomah and Washington Counties Multnomah Washington County Clackamas	homeless, re-entry population, ABAWDS)Washington CountyABAWDSClackamas CountyABAWDSClackamas CountyABAWDSClackamas CountyABAWDSMarion CountyABAWDSMultnomah CountiesABAWDSMultnomah CountiesABAWDSMultnomah CountiesABAWDSMultnomah CountiesABAWDSMultnomahABAWDSMultnomahABAWDSMultnomahABAWDSMultnomahABAWDSClackamasABAWDS	homeless, re-entry population, ABAWDS       participants (unduplicated count)         Washington County       ABAWDS       3         Clackamas County       ABAWDS       4         Clackamas County       ABAWDS       4         Clackamas County       ABAWDS       10         Marion County       ABAWDS       10         Multnomah       ABAWDS       20         Multnomah and Washington Counties       ABAWDS       50         Multnomah       ABAWDS       4         Multnomah       ABAWDS       3         Multnomah       ABAWDS       3         Multnomah       ABAWDS       50         Multnomah       ABAWDS       3         Clackamas       ABAWDS       3         Multnomah       ABAWDS       3         Clackamas       ABAWDS       3         Clackamas       ABAWDS       5

\*Affiliate of Oregon Food Bank

# 6. Information about the education, training, and workfare components it will offer to meet the ABAWD work requirement

Oregon pledges to offer a qualifying activity to each at-risk ABAWD applicant or recipient (not exempted or in a waived county) beginning with the first complete month of eligibility. Non-exempt and non-waived ABAWDS are not eligible to receive SNAP benefits for more than three months in a 36-month period unless the individual meets the work requirement.

Oregon has elected to have a statewide contract for ABAWD services. OED has been selected to be this provider. This will ensure consistent and qualifying services are provided to all at-risk ABAWDS. Due to limited funding provided through the ABAWD Pledge funds, contracting with OED allows for leveraging of services provided as part of the STEP contracts.

The qualifying services provided by OED, while consistent with the services provided to the general population, will be at an enhanced or expanded capacity for the at-risk ABAWDS. There will be individualized services provided to guide the ABAWD from one activity to the next. There will also be case management provided to ensure progression and that they are meeting the work activity requirements. Regulations at 7 CFR 273.24(a) provide that fulfilling the work requirement means:

• Working 20 hours or more per week, averaged monthly to 80 hours;

- Participating in and complying with the requirements of a work program for 20 hours a week or more;
- Any combination of working and participating in a work program for a total of 20 hours per week; or

(link is external)

• Participating in and complying with the requirements of a workfare program.

Workfare is an E&T component for ABAWDS (non-exempt and living in non-waived county) to fulfill their work requirement to continue receiving their SNAP benefits beyond the three countable months in thirty-six months. The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value in their community.

Workfare hourly requirements are determined by utilizing the Fair Labor Standards Act (FLSA) and are equivalent to household benefits divided by the Oregon minimum wage. Oregon has three official minimum wage tiers, administered based on geographic areas. DHS has devised a calculator for each county based on the minimum wage tier that it falls into. This ensures that participants do not exceed the number of hours that are equivalent to their benefits divided by the official Oregon minimum wage for their geographic area. Information about Oregon's minimum wage system is available at this link: http://www.oregon.gov/boli/WHD/OMW/Pages/Minimum-Wage-Rate-Summary.aspx

As allowed by 7 CFR §273.7 and §273.24, services from other sources will count toward SNAP E&T work requirements. Other sources include:

- Work services under Workforce Innovation and Opportunity Act (WIOA); and
- Work services under the Trade Adjustment Assistance (TAA).

For FFY 2020, Oregon will comply with the commitment to offer either a qualifying education, training, or workfare opportunity to every ABAWD participant (not exempted or living in a waived county) beginning with the first complete month allowing the state to receive a portion of the \$20 million used to reimburse state agencies for costs incurred in serving ABAWDS.

Oregon is seeking additional funding for costs incurred in serving ABAWDS subject to the threemonth time limit. We anticipate that many participants will be enrolled simultaneously in more than one activity and participate for more than one month. To support participants, transportation and other necessary and related support service costs will be available to ABAWDS every month they are enrolled and participating in a component activity.

Oregon estimates spending approximately \$468.98 monthly for each non-exempt ABAWD in non-waived counties which translates to approximately \$3,894,367.72.

The additional funding is needed to ensure that qualifying work activities are offered.

For FFY 2020, Oregon will continue to provide structured components to ABAWDS through referral to OED. OED will work with the participant to utilize the array of E&T providers for ABAWD's to meet their work-related activities requirements.

Components for these areas are as follows:

- Supervised Job Search
- Job Search Training
- Job Retention

- Basic Education/Foundational Skills Instruction
- Career/Technical Education or other Vocational Training
- English Language Acquisition
- Integrated Education and Training/Bridge Program
- Work Readiness
- Self-Employment Training
- On-the-job Training
- Pre-Apprenticeship/Apprenticeship
- Internship
- Work Experience

#### Supervised Job Search:

Description: Participants who are work ready (as determined by assessment), recently unemployed, or need assistance with job search will be referred to this component. Supervised job search must have a case plan that includes oversight, tracking, review, and assessment, as well as providing regular, or at least one time per month, check-ins or meetings to report on the job search progress or to adjust the case plan. All services must be provided in a state approved location.

ABAWDS (non-exempt and those in non-waived counties): Supervised Job Search activities cannot exceed nine hours per week and must be combined with other work-related activities to equal twenty hours per week. However, if the ABAWD is participating in job search through a WIOA program/activities or in the 30 days prior to the start of workfare, they can exceed 9 hours per weekly. Participants will submit their job contact forms to OED weekly for tracking participation.

STEP: Supervised Job Search activities within this program vary, depending upon the targeted audience and provider.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers		Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
,		SNAP recipients who are homeless or formerly homeless	60	\$28,398.00
Dress for Success	Portland Metro	Female SNAP recipients	50	\$59,700.79
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	38	\$9,291.71
Outside In		SNAP Recipients-Homeless Youth	15	\$577.45
Portland State University		SNAP Recipients-Students enrolled full time or part time	10	\$1,448.80
Stone Soup		SNAP Recipients at risk of homelessness	3	\$3,170.90
Dress for Success	Salem Metro	Female SNAP recipients	41	\$20,921.62
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	30	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	2	\$571.00
Goodwill Industries-Lane County	Lane County	Veterans, disadvantaged and disabled SNAP recipients	208	\$17,839.48
Lane County Health and Human Services		SNAP recipients who are unstably housed or homeless	13	\$6,052.68
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	9	\$1,741.66
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	32	\$5,072.00
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	18	\$8,328.89
Maslow	-	SNAP recipients who are unstably housed or homeless	2	\$2,919.90

	Klamath County	Veterans, disadvantaged and	11	\$1,979.17
Oregon Goodwill	-	disabled SNAP recipients	-	
Klamath Works, Inc.	Lake and Klamath County	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	31	\$15,869.33
Institute	Crook, Deschutes, Jefferson, Baker, Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	4	\$2,771.87
· ·	Clackamas, Multnomah, Marion, Washington	SNAP Recipients-Underserved youth	15	\$2,513.50
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	36	\$6,508.06
Home Plate	Washington County	SNAP recipients-Homeless Youth	6	\$1,294.11
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	304	\$93,708.92
Oregon Employment Department- STEP	Statewide	SNAP Recipients	993	\$635,900.00
Community College Consortia	Throughout state	SNAP Recipients	44	\$19,667.71

#### Job Search Training:

Description: A component that strives to enhance the job search skills of participants by providing instruction in job seeking techniques and increasing motivation and self-confidence. The component may consist of job skills assessments, job placement services, or other direct training or support activities. Other activities may include resume writing workshops and learning how to use online job search tools. The job search training component may combine job search activities with other training and support activities.

ABAWD: Job Search Training may include resume writing workshops, interviewing workshops, and more training related to Job Search. Job Search Training activities cannot exceed nine hours per week and must be combined with other work-related activities to equal twenty hours per week unless the ABAWD is participating through a WIOA program.

STEP: Job Search Training activities within this program vary, depending upon the targeted audience and providers.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Central City Concern	Multnomah County, Clackamas County	SNAP recipients who are homeless or formerly homeless	70	\$28,397.60
Dress for Success	Portland Metro	Female SNAP recipients	10	\$13,954.91
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	9	\$2,144.24
Outside In	Multnomah County	SNAP Recipients- Homeless Youth	20	\$975.50
Portland State University	Portland Metro	SNAP Recipients-Students enrolled full time or part time	10	\$1,448.80
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	36	\$3,170.90
Dress for Success	Salem Metro	Female SNAP recipients	9	\$9,509.82
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	15	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	4	\$1,816.86
Goodwill Industries-Lane County	Lane County	Veterans, disadvantaged and disabled SNAP recipients	60	\$5,146.00
Lane County Health and Human Services	Lane County	SNAP recipients who are unstably housed or homeless	8	\$3,362.60
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	4	\$634.00
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	1	\$1,751.94

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Klamath Works, Inc.	Lake and Klamath County	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	15	\$12,060.70
Baker Technical	Crook, Deschutes,	SNAP Recipients	4	\$2,771.87
Institute	Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties			
Leadership Lab	Clackamas, Multnomah, Marion, Washington	SNAP Recipients- Underserved youth	15	\$11,450.40
Clackamas	Clackamas County	SNAP Recipients	7	\$8,642.54
County Children, Family & Community Connections	-			
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	448	\$138,741.00
Work Systems	Clackamas, Clatsop,	SNAP Recipients	64	\$27,206.46
Inc Oregon Work Experience	Columbia, Tillamook, Linn, Marion, Polk, Yamhill, Multnomah, Washington, Hood River, Wasco, Sherman, Gilliam, Wheeler, Jefferson, Crook, Deschutes, Klamath, Lake, Coos, Douglas, Curry Counties			
Centro Cultural	Washington County	Spanish speaking or	7	\$1,220.26
De Condado De Washington		bilingual SNAP Recipients		
Home Plate	Washington County	SNAP recipients-Homeless Youth	7	\$2,588.21
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	243	\$93,708.90

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Oregon Employment Department- STEP	Statewide	SNAP Recipients	993	\$635,900.00
Community College Consortia	Throughout state	SNAP Recipients	95	\$42,531.07

#### Job Retention:

Description: Services provided to E&T participants who have secured employment after participating in another E&T component, are no longer participating in another E&T component, and are no longer receiving SNAP benefits. This component is meant to help achieve satisfactory performance, retain employment, or to increase earnings over time. The participant may receive up to 90 days of job retention services. The 90 days begins when the SNAP benefits end. If a participant becomes employed and is still receiving SNAP benefits, services must be provided under a component other than retention.

#### ABAWD: Offered statewide to assist ABAWDS in retaining employment and increasing earning potential.

*STEP:* Most STEP providers in Oregon offer this component as a part of their program and collaborate with other STEP providers to ensure that the participant is receiving the most comprehensive Job Retention Services.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers		Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
		SNAP recipients who are homeless or formerly homeless	50	\$14,198.97
Dress for Success	Portland Metro	Female SNAP recipients	7	\$7,256.55
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	8	\$1,906.00
Outside In	Multnomah County	SNAP Recipients-Homeless Youth	2	\$737.44
Portland State University		SNAP Recipients-Students enrolled full time or part time	10	\$1,448.80

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Dress for	Salem Metro	Female SNAP recipients	8	\$4,945.11
Success	-			
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	15	\$1,881.46
Youth	Lincoln County	SNAP Recipients- Ages 18-24	10	\$415.28
Development Coalition of Lincoln County	-			
Lane County	Lane County	SNAP recipients who are	6	\$1,569.21
Health and Human Services	-	unstably housed or homeless	-	
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	4	\$1,227.08
Goodwill	Curry and Coos	Veterans, disadvantaged and	8	\$3,811.53
Industries of Lane		disabled SNAP recipients		
&South Coast Counties	-		_	
Maslow	Josephine and	SNAP recipients who are	1	\$1,167.96
	Jackson County	unstably housed or homeless		
Southern Oregon	Klamath County	Veterans, disadvantaged and	5	\$791.67
Goodwill		disabled SNAP recipients	0	<i><i><i>ϕ</i>iϕiqiϕiqiϕiqiqiqiqiqiqiq<i></i></i></i>
Klamath Warks	Lake and Klameth		10	¢9.252.00
Klamath Works, Inc.	County	SNAP participants who are transitioning from drug/alcohol	10	\$8,252.00
		treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	_	
Baker Technical	Crook, Deschutes,	SNAP Recipients	2	\$1,187.94
Institute	Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	-		
Leadership Lab	Clackamas, Multnomah, Marion, Washington	SNAP Recipients-Underserved youth	15	\$2,513.50
Clackamas County Children, Family &	Clackamas County	SNAP Recipients	3	\$2,304.68

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Community Connections	_			
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	29	\$40,464.17
Centro Cultural De Condado De Washington*	Washington County	Spanish speaking or bilingual SNAP Recipients	5	\$903.90
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	54	\$46,854.46
Oregon Employment Department- STEP	Statewide	SNAP Recipients	350	\$141,311.09
Community College Consortia	Throughout state	SNAP Recipients	12	\$8,791.53

#### **Education Components:**

The Food and Nutrition Act of 2008 prohibits State agencies from supplanting State education costs with Federal E&T funds. Only educational components that establish a direct link to job-readiness will be approved, although programs that involved articulated career pathways or stackable credentials that ultimately lead to employment are encouraged.

Oregon's E&T funds will only be used for education/training if:

- Federal funds are not used to supplant other funding;
- The provider and/or individual has attempted to secure federal assistance (not including loans) such as the Pell Grant, and such funds are not available; and
- The education costs are associated with E&T program engagement.

Oregon will not authorize expenses for operating educational/training components that exceed the normal costs of services provided to persons *not participating* in SNAP E&T programs and educational expenses will not be paid for training/education that is normally available to the public at no cost.

Oregon's providers offer several categories of services within the education component. These are:

- Basic Education/Foundational Skills Instruction
- Career/Technical Education or other Vocational Training

- English Language Acquisition
- Integrated Education and Training/Bridge Program
- Work Readiness

#### **Basic Education / Foundational Skills Instruction:**

Description: Programs that offer academic instruction and education services below the postsecondary level that increase an individual's ability to read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent; transition to postsecondary education and training; and obtain employment. Such programs include Adult Basic Education (ABE), basic literacy, and high school equivalency (GED, TASC, HiSET, or other).

ABAWD: Educational activities are provided when they will directly enhance the participant's employability in a field with anticipated workforce shortages and may include GED testing and preparation, as well as basic literacy classes. This component is available for participants over age 21.

*STEP:* Several STEP providers have basic education components. They offer 1:1 assistance to the participant as they prepare for the ABE/GED required tests. They provide enhanced services in the form of direct tutoring/coaching which is not available to the general public. This component can be completed in conjunction with another component, such as supervised job search.

Reporting Measure(s) if >100 participants per year:

Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T

Providers	Geographic area	homeless, re-entry	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	11	\$2,620.74
Outside In	Multnomah County	SNAP Recipients- Homeless Youth	8	\$1,334.12
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	15	\$4,703.65
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	2	\$467.19
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	5	\$141.17
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	1	\$1,167.96

Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	1	\$1,979.91
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	3	\$451.95
Home Plate	Washington County	SNAP recipients- Homeless Youth	6	\$1,294.11
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	11	\$2,500.00
Oregon Employment Department-STEP	Statewide	SNAP Recipients	100	\$15,917.00
Community College Consortia	Throughout state	SNAP Recipients	160	\$116,644.85

#### Career / Technical Education or Other Vocational Training:

Description: Organized activities at the post-secondary level that provide individuals with the academic and technical knowledge and skills necessary to prepare for further education and for careers in current or emerging employment sectors. Programs are primarily designed for those who are beyond the age of compulsory high school attendance. Ideally, such programs should be employer-driven and could lead to industry-recognized certificates or credentials.

ABAWD: This component is offered depending upon geographic region and available resources. OED refers ABAWD participants to STEP providers offering Career/Technical Education or Other Vocational Training, and will be given support service funding to assist participants in the training costs.

STEP: Several STEP providers provide participants with multiple options for certificate programs such as CNA, Flagging, Pesticide Certification, Master Gardner Certification, Food Handler's training, and Oregon Liquor Control Certification. The participants are coached through their training with enhanced case management.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4th quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Dress for Success	Portland Metro	Female SNAP recipients	8	\$3,907.37

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17-24)	4	\$953.00
Outside In	Multnomah County	SNAP Recipients- Homeless Youth	7	\$2,581.03
Portland State University	Portland Metro	SNAP Recipients-Students enrolled full time or part time	44	\$3,622.00
Dress for Success	Salem Metro	Female SNAP recipients	5	\$2,662.75
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP recipients	30	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	30	\$778.65
Food for Lane	Lane County	SNAP recipients	16	\$8,003.55
Goodwill Industries-Lane County	Lane County	Veterans, disadvantaged and disabled SNAP recipients	10	\$857.66
Lane County Health and Human Services	Lane County	SNAP recipients who are unstably housed or homeless	2	\$11,432.80
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	2	\$1,227.08
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	2	\$317.00
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	2	\$988.17
Maslow	Josephine and Jackson County	SNAP recipients who are unstably housed or homeless	10	\$1,167.96
Southern Oregon Goodwill	Klamath County	Veterans, disadvantaged and disabled SNAP recipients	2	\$593.75

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Klamath Works, Inc.	Lake and Klamath County	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	7	\$3,173.88
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	5	\$27,718.70
Clackamas County Children, Family & Community Connections	Clackamas County	SNAP Recipients	4	\$576.17
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	43	\$36,257.10
Work Systems Inc Oregon Work Experience	Clackamas, Clatsop, Columbia, Tillamook, Linn, Marion, Polk, Yamhill, Multnomah, Washington, Hood River, Wasco, Sherman, Gilliam, Wheeler, Jefferson, Crook, Deschutes, Klamath, Lake, Coos, Douglas, Curry Counties	SNAP Recipients	41	\$17,394.29
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	44	\$7,954.30
Home Plate	Washington County	SNAP recipients-Homeless Youth	7	\$3,623.50
Oregon Employment Department- ABAWD	Statewide	SNAP Recipients	44	\$3,750.00
Oregon Employment	Statewide	SNAP Recipients	400	\$212,222.64

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Department- STEP				
Community College Consortia	Throughout state	SNAP Recipients	396	\$290,685.99

#### English Language Acquisition:

Description: A component designed to help English language learners achieve competence in reading, writing, speaking, and comprehension of the English language.

ABAWD: This component is offered depending participant need and availability. Participants attend short-term ELA training as a component of their case plan.

STEP: Oregon's STEP providers work with participants to determine the case plan that will assist with the components needed to gain employment. The STEP providers listed below have an identified ELA program. (Note: Most STEP providers refer participants to needed ESL courses and some have included this in their participant numbers/program costs under Basic Education.)

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re- entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	1	\$362.20
Sparrow Furniture	Salem Metro	SNAP Recipients – resettled refugee and asylees	7	\$3,300.84
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP Recipients	6	\$940.73
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker, Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	3	\$791.96
Centro Cultural De Condado De Washington	Washington County	Spanish speaking or bilingual SNAP Recipients	3	\$4,519.49
Home Plate	Washington County	SNAP recipients- Homeless Youth	4	\$258.82
Oregon Employment	Statewide	SNAP Recipients	11	\$1,250.00

Providers	Geographic area	Target audience (e.g., homeless, re- entry population, ABAWDS)		Anticipated monthly cost
Department-				
ABAWD				
Oregon	Statewide	SNAP Recipients	100	\$70,740.88
Employment				
Department-STEP				
Community	Throughout state	SNAP Recipients	71	\$37,890.69
College Consortia				

#### Integrated Education and Training/Bridge Programs:

Description: Programs that provide adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or group of occupations for the purpose of educational and career advancement.

Reporting Measure(s) if >100 participants per year:

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	3	\$724.40
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP Recipients	15	\$14,110.94
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	10	\$415.28
Community College Consortia	Throughout state	SNAP Recipients	54	\$57,936.75

#### Work Readiness Training:

Description: Intensive programs that include skill assessment and educational remediation services that prepare individuals for the workforce. Work readiness skills may include both foundational cognitive skills such as reading for information, applied mathematics, locating information, problem solving, and critical thinking and non-cognitive skills, or soft skills, which are defined as personal characteristics and behavioral skills that enhance an individual's interactions, job performance, and career prospects such as adaptability, integrity, cooperation, and workplace discipline.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Outside In	Multnomah County	SNAP Recipients – Homeless Youth	10	\$3,687.14
Portland State University	Portland Metro	SNAP Recipients	2	\$724.40
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	SNAP Recipients	15	\$9,407.29
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	2	\$415.28
Klamath Works, Inc	Lake and Klamath Counties	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	23	\$22,217.13
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	5	\$1,187.94
Clackamas Workforce Partnership*	Clackamas County	SNAP Recipients	8	\$7,859.67
Leadership Lab	Clackamas, Multnomah, Marion, Washington	SNAP Recipients-Underserved youth	15	\$11,450.38

#### Work Components:

- On-the-Job Training (OJT)
- Self-Employment Training
- Pre-Apprenticeships and Apprenticeships
- Internship Programs
- Workfare
- Work Experience

#### On-the-Job Training (OJT):

Description: A work placement made through a contract with an employer or registered apprenticeship program sponsor in the public, private non-profit, or private sector. An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's individual employment plan

Reporting Measure(s) if >100 participants per year: N/A

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	5	\$1,448.80
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	3	\$940.73

#### Self-Employment Training:

Description: A component that improves the employability of participants by providing training in setting-up and operating a small business or other self-employment venture.

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	2	\$181.10
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$4,703.65
Youth Development Coalition of Lincoln County	Lincoln County	SNAP Recipients- Ages 18-24	3	\$311.46

#### **Pre-Apprenticeships and Apprenticeships**

**Description:** A combination of on-the-job training and related instruction in which workers learn the practical and theoretical aspects of a skilled occupation. Apprenticeship programs can be sponsored by individual employers, joint employer and labor groups, and/or employer associations. Pre-Apprenticeship programs provide individuals with the basic and technical skills necessary to enter an apprenticeship program and should be directly linked to an apprenticeship program.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Outside In	Multnomah County	SNAP Recipients – Homeless Youth	2	\$97.55
Sparrow Furniture	Salem Metro	SNAP Recipients – resettled refugee and asylees	21	\$29,707.67
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$940.73
Klamath Works, Inc	Counties	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	2	\$1,269.55
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	28	\$35,056.92
Home Plate	Washington County	SNAP recipients-Homeless Youth	3	\$1,294.10
Community College Consortia	Throughout state	SNAP Recipients	17	\$22,850.06

#### Internship:

Description: A planned, structured learning experience that takes place in a workplace for a limited period of time.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	homeless, re-entry	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Portland State University	Portland Metro	SNAP Recipients	10	\$1,448.80
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	3	\$3,170.90

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$9,407.29
Home Plate	Washington County	SNAP recipients- Homeless Youth	3	\$3,588.21
Community College Consortia	Throughout state	SNAP Recipients	35	\$16,864.82

#### Work Experience:

Description:

A work component designed to improve the employability of participants through actual work experience and/or training. Work experience assignments may not replace the employment of a regularly employed individual, and they must provide the same benefits and working conditions provided to regularly employed individuals performing comparable work for comparable hours. It is permissible to place E&T participants in work experience positions with private sector entities. In Oregon, this component is only offered for STEP participants who are non-ABAWD or ABAWD exempt.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Central City	Multnomah County,	SNAP recipients who are	615	\$86,771.30
Concern	Clackamas County	homeless or formerly homeless		
New Avenues For Youth	Portland Metro	SNAP recipients (Youth ages 17- 24)	9	\$6,909.22
Outside In	Multnomah County	SNAP Recipients-Homeless Youth	45	\$5,497.00
Portland State University	Portland Metro	SNAP Recipients	5	\$1,448.80
Stone Soup	Portland Metro	SNAP Recipients at risk of homelessness	3	\$23,613.00
Community Services Consortium	Linn, Benton, Lincoln, and Polk Counties	SNAP Recipients	15	\$18,814.58
Goodwill Industries of	Lane County	Veterans, disadvantaged and disabled SNAP recipients	3	\$257.30

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Lane &South Coast Counties	-			
Goodwill Industries of Lane &South Coast Counties	Curry and Coos County	Veterans, disadvantaged and disabled SNAP recipients	6	\$79.25
Southern Oregon Goodwill	Josephine and Jackson County	Veterans, disadvantaged and disabled SNAP recipients	2	\$7,764.22
Southern Oregon Goodwill	Klamath County	Veterans, disadvantaged and disabled SNAP recipients	1	\$593.75
Southern Oregon Goodwill	Douglas County	Veterans, disadvantaged and disabled SNAP recipients	5	\$197.92
Klamath Works, Inc	Lake and Klamath Counties	SNAP participants who are transitioning from drug/alcohol treatment, those transitioning from parole and probation, families transitioning from TANF, and those transitioning from mental health services.	15	\$8,252,08
Baker Technical Institute	Crook, Deschutes, Jefferson, Baker Union, Wallowa, Malheur, Grant, Harney Counties	SNAP Recipients	10	\$1,187.94
Work Systems Inc.	Clackamas, Multnomah, Marion, Linn, Polk, Yamhill, Washington Counties	SNAP Recipients	8	\$6,459.71
Centro Cultural De Condado De Washington		Spanish speaking or bilingual SNAP Recipients	2	\$4,338.71
Community College Consortia	Throughout state	SNAP Recipients	5	\$4,195.47

Workfare (for non-exempt ABAWDS in non-waived counties only)

#### Workfare:

Description: A work component in which SNAP recipients perform work in a public service capacity as a condition of eligibility. In lieu of wages, workfare participants receive compensation in the form of their household's monthly coupon allotment. The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value to the community. Only ABAWD's who reside in non-waived counties may participate in workfare.

Oregon has the sole responsibility of establishing Workfare sites. They must be a private or public non-profit agency serving in a public service capacity.

Oregon is also currently contracting with the Oregon Food Bank (OFB) to provide services across the state. Within the contract, OFB and other Workfare partner sites will have oversight of worksite placements and agreements. OFB will report quarterly on the required outcomes to DHS. In addition, other organizations, in the counties subject to the time limits, have been approved to be included as workfare sites.

OED, as the statewide ABAWD provider, has data sharing agreements and an MOU with all approved Workfare partners. They are responsible for referring ABAWD participants to their sites.

DHS will determine the workfare hours. In Oregon, the maximum number of hours that are required (and allowed) of an ABAWD each month is determined by dividing the household's SNAP benefit allotment by the State minimum wage. This is then divided by four to get the maximum weekly hours, rounding down if needed. As of 7/1/17, we have three official State minimum wage tiers. Link to Oregon wage rate information: http://www.oregon.gov/boli/WHD/OMW/Pages/Minimum-Wage-Rate-Summary.aspx

(link is external)

FLSA is calculated by using the minimum wage where the workfare position is performed. If a participant meets the FLSA level of participation in workfare, they do not need to participate in other activities to continue getting their SNAP benefits beyond three months.

- Unsubsidized employment in 2<sup>nd</sup> quarter after completion of participation in E&T
- Unsubsidized employment in 4<sup>th</sup> quarter after completion of participation in E&T

Providers	Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Benton Habitat for Humanity	Benton County	ABAWDS	10	\$0.00
Bethlehem House of Bread*	Washington County	ABAWDS	TBD	\$0.00
Catholic Community Charities*	Marion County	ABAWDS	20	\$0.00
Clackamas Service Center*	Clackamas County	ABAWDS	8	\$0.00
Clay Street Table*	Multnomah	ABAWDS	6	\$0.00
EMO NE Emergency Food Program*	Multnomah	ABAWDS	6	\$0.00

Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost
Washington County	ABAWDS	3	\$0.00
Clackamas County	ABAWDS	4	\$0.00
Clackamas County	ABAWDS	TBD	\$0.00
Marion County	ABAWDS	10	\$0.00
Multnomah	ABAWDS	20	\$0
Multnomah and Washington Counties	ABAWDS	50	\$9,012.66
Multnomah	ABAWDS	4	\$0
Washington County	ABAWDS	3	\$0.00
Clackamas County	ABAWDS	5	\$0.00
	Washington County Clackamas County Clackamas County Marion County Marion County Multnomah Multnomah and Washington Counties Multnomah Washington County Clackamas	homeless, re-entry         homeless, re-entry         population, ABAWDS)         Washington         County         Clackamas         County         Clackamas         County         Clackamas         ABAWDS         County         Clackamas         County         Marion County         ABAWDS         Multnomah         ABAWDS         Multnomah and         Washington         Counties         Multnomah         ABAWDS         Multnomah         ABAWDS         Multnomah         ABAWDS         Counties         Multnomah         ABAWDS         Clackamas         ABAWDS         Clackamas         ABAWDS	homeless, re-entry population, ABAWDS 3 County ABAWDS 3 Clackamas ABAWDS 4 Clackamas ABAWDS 4 Clackamas ABAWDS TBD Clackamas ABAWDS 10 Marion County ABAWDS 10 Multnomah ABAWDS 20 Multnomah and ABAWDS 50 Multnomah ABAWDS 50 Washington Counties 4 Multnomah ABAWDS 4 County ABAWDS 3 County Counties 4 Multnomah ABAWDS 50

\*Affiliate of Oregon Food Bank

#### Trade Adjustment Assistance (TAA)

There are no program-specific state planning requirements for TAA. If the state includes TAA in a Combined State Plan, the state must incorporate TAA in its responses to the common planning elements in sections II, III, IV, and V of the WIOA State Plan requirements instrument.

Yes

## Senior Community Service Employment Program (SCSEP)

(OMB Control No. 1205-0040)

#### a. Economic Projections and Impact

1. Discuss long-term projections for jobs in industries and occupations in the State that may provide employment opportunities for older workers. (20 CFR 641.302(d)) (May

## alternatively be discussed in the economic analysis section of strategic plan.)

Workers age 55 and older made up twenty-three percent of Oregon's workforce in 2017 (Table 1). The Health Care and Social Assistance field currently employs the greatest number of older workers (64,327) in Oregon, and that industry is expected to need the most replacement workers as these employees exit the workforce. With thirty-three percent of all employees age 55 or older, Mining and Quarrying is the industry that now employs the greatest share of Oregon's older workers. However, mining jobs account for a relatively small share of overall workers, with only 1,902 out of more than 1.8 million in total.

According to projections by the Oregon Employment Department, the industries expected to have the highest number of openings by 2027 are Private Educational and Health Services (54,700), Professional and Business Services (41,200), Trade, Transportation, and Utilities (36,700); and Leisure and Hospitality (26,900). Together these four industries are projected to have more than 159,500, or approximately sixty-five percent, of total job openings between 2017 and 2027.

Natural Resources and Utilities have the highest share of workers 55 and over, but Health Care and Social Assistance has the most workers 55 and over.

	Workers All	Workers Age 55 and	Percent Age 55 and
	Ages	Over	Over
All Industries	1,838,059	426,530	23%
Mining and Quarrying	1,902	633	33%
Utilities	7,477	2,335	31%
Agriculture, Forestry, Fishing and Hunting	48,652	14,845	31%
Transportation and Warehousing	60,451	17,685	29%
Real Estate and Rental and Leasing	27,857	8,140	29%
Public Administration	73,358	20,540	28%
Educational Services	149,838	41,750	28%
Other Services	74,886	20,232	27%
Wholesale Trade	75,940	19,429	26%
Manufacturing	187,500	46,055	25%
Health Care and Social Assistance	268,212	64,327	24%
Finance and Insurance	56,398	13,249	23%
Construction	101,858	22,449	22%
Professional, Scientific, and Technical Services	95,612	20,494	21%
Administrative Support and Waste Services	103,008	21,768	21%
Retail Trade	206,135	42,936	21%
Management of Companies and Enterprises	48,971	10,029	20%

	Workers All Ages	Workers Age 55 and Over	Percent Age 55 and Over
Information	37,373	7,390	20%
Arts, Entertainment, and Recreation	32,154	6,348	20%
Accommodation and Food Services	180,471	25,880	14%

Private and public average employment for 2018

Source: Oregon Employment Department and U.S. Census Bureau, LEHD

# 2. Discuss how the long-term job projections discussed in the economic analysis section of strategic plan relate to the types of unsubsidized jobs for which SCSEP participants will be trained and the types of skill training to be provided. (20 CFR 641.302(d))

Older workers accounted for only ten percent of Oregon's workforce in 1992. That figure has more than tripled since then to reach twenty-three percent by 2017. Baby Boomers have undoubtedly played a role in this shift, but the Great Recession also hit aging workers hard, leading many to work beyond the traditional retirement age of 65. Twenty-five percent of Oregon SCSEP participants in PY 2018 were 65 or older (Table 2).

Participant Age and Enrollment	PY 2018 Percent
55-59	44%
60-64	31%
65-69	18%
70-74	4%
75 & over	3%

SCSEP participants benefit from training they receive at community service assignments like Area Agency on Aging (AAA) offices, senior centers, Centers for Independent Living (CILs), governmental offices, hospitals, schools, and libraries. Over the course of this four-year plan, SCSEP grantees will continue to build and maintain relationships with host agencies and other partners in the high growth fields identified above. Under the Oregon Workforce and Talent Development Board (WTDB) Strategic Plan, Local Workforce Development Boards (LWDBs) are tasked with implementing sector strategies to address the needs of key industries. Sector strategies are public/private partnerships designed to meet the needs of critical industry sectors within the regional labor markets. The partnerships are intended to facilitate communication and eliminate barriers that slow the process of recruiting, hiring, training, and advancing workers within an industry. LWDBs will develop or expand partnerships in key industries for a more highly skilled workforce. LWDBs will determine which sectors to prioritize in their region, but some examples include clean technology, natural resource industries, health services, and business services. Sector strategies are expected to create opportunities for SCSEP enrollees as well as participants in other workforce programs to engage with local employers and identify new placement opportunities.

SCSEP participants have access to free training on a variety of topics including computers, reading, and math skills. Host agency sites offer participants the chance to become familiar with common office equipment and procedures such as word processing software, computer-based scheduling programs, email etiquette, and customer service skills. SCSEP participants are encouraged to take advantage of these opportunities to enhance their competitive edge in the job market.

3. Discuss current and projected employment opportunities in the State (such as by providing information available under §15 of the Wagner-Peyser Act (29 U.S.C. 491-2) by occupation), and the types of skills possessed by eligible individuals. (20 CFR 641.325(c))

Workers age 55 and older make up approximately twenty-three percent of Oregon's total workforce. Nearly half (46%) of those individuals are currently employed in Health Care and Social Assistance (64,327), Manufacturing (46,055), Retail Trade (42,936), and Educational Services (41,750) (see Table 1). Looking ahead to 2027, the Oregon Employment Department projects that most new job openings will be in Private Educational and Health Services (54,700); Professional and Business Services (41,200); Trade, Transportation, and Utilities (36,700); and Leisure and Hospitality (26,900). SCSEP participants receive training in a variety of topic areas and these industry trends will inform strategies to prepare participants for the best possible employment outcomes.

Many SCSEP applicants have been out of the workforce for an extended period of time and they may lack the computer skills demanded by many employers. The Oregon SCSEP provides basic and advanced computer skills training to all participants, depending on their needs, helping them develop the necessary skills to secure meaningful employment. Basic computer skills courses include general computer skills and Windows basics. Participants may advance to learn intermediate skills in Microsoft Word, Excel, and PowerPoint. SCSEP participants also take part in Job Club, which is designed to help them develop skills to maximize their job search efforts and secure unsubsidized employment.

To ensure that community service assignments provide training that meets the needs of participants, all SCSEP participants complete an assessment and enter it in iMatch Skills before being assigned. iMatch Skills identifies the types of job openings in the community that most closely match the participant's assessment. Once a participant has indicated the type of job they wish to train for, SCSEP staff searches for a community service assignment that can provide appropriate training for that position.

#### b. Service Delivery and Coordination

1. A description of actions to coordinate SCSEP with other programs. This may alternatively be discussed in the State strategies section of the strategic plan, but regardless of placement in document, must include:

A. Planned actions to coordinate activities of SCSEP grantees with WIOA title I programs, including plans for using the WIOA one-stop delivery system and its partners to serve individuals aged 55 and older. (20 CFR 641.302(g), 641.325(e))

SCSEP participants are enrolled with the American Job Centers (known in Oregon as WorkSource offices), through which WIOA Title I services are available. These services include, among others, assistance with job search and job placement, individual employment plan development, counseling, and career planning services.

Oregon SCSEP has a Memorandum of Understanding (MOU) with each LWDB in its service area. Several SCSEP local offices have staff stationed in the WorkSource offices, which increases program visibility and streamlines access to SCSEP services. Some WorkSource offices also serve as SCSEP host agency sites. The staff at WorkSource offices is more likely to promote SCSEP and refer qualified individuals for eligibility screening when they are familiar with the program.

## B. Planned actions to coordinate activities of SCSEP grantees with the activities being carried out in the State under the other titles of the Older Americans Act (OAA). (20 CFR 641.302(h))

The Oregon SCSEP sub-grantee, Experience Works, and national grantee, Easterseals Oregon, maintain relationships with the local AAAs to coordinate services and make appropriate referrals to one another. SCSEP participants have access to other Older Americans Act programs offered through the AAAs, including case management, nutrition, transportation, and housing services. AAAs refer individuals who may be eligible for SCSEP to the local projects for eligibility screening. This relationship benefits both SCSEP and AAAs by helping aging Oregonians maintain their independence as long as possible.

# C. Planned actions to coordinate SCSEP with other private and public entities and programs that provide services to older Americans, such as community and faith- based organizations, transportation programs, and programs for those with special needs or disabilities. (20 CFR 641.302(i))

SCSEP projects work with government programs such as the Office of Vocational Rehabilitation Services (OVRS) and Veterans Services to provide additional resources for participants with unique needs. OVRS provides individualized services that assist people with disabilities find and keep a job. Thirty-one percent of SCSEP participants in Program Year 2018 were individuals with disabilities.

Grantees partner with non-profit organizations in their communities that provide services to older Americans as host agency training sites. Some successful partnerships in Oregon include St. Vincent de Paul, Habitat for Humanity, and Salvation Army. These arrangements help foster economic selfsufficiency for SCSEP participants while also providing much needed support to community organizations. SCSEP grantees will continue to use their community connections to identify and develop partnerships with organizations that serve older Oregonians.

Easterseals Oregon has joined Comcast Oregon in support of their Internet Essentials program which provides seniors and low-income individuals with high-speed internet services from Comcast. For \$9.95 per month plus tax, Comcast installers will come to the participants' homes and provide necessary equipment and installation for free. There is no credit check and no contracts to sign. This gives SCSEP participants greater access to job opportunities, healthcare and benefits, and educational resources. Through this program, participants also have the ability to purchase laptops at under \$150 for their personal use.

## D. Planned actions to coordinate SCSEP with other labor market and job training initiatives. (20 CFR 641.302(j))

SCSEP projects in Oregon already have joined forces with the LWDBs and WorkSource offices in their areas to share resources and strengthen communication between workforce programs. LWDB meetings provide opportunities for SCSEP staff to network with local business leaders, address the needs of older workers, and identify potential resources in their service areas. Partnerships between SCSEP and the LWDBs are mutually beneficial for both programs involved, and their continued utilization will be encouraged in the future.

## E. Actions to ensure that SCSEP is an active partner in the one-stop delivery system and the steps the State will take to encourage and

## improve coordination with the one-stop delivery system. (20 CFR 641.335)

SCSEP projects work closely with the local WorkSource offices in their daily operations. In many cases SCSEP is co-located in the WorkSource office along with other employment programs. This relationship allows local SCSEP staff to stay informed of changing labor market trends in their region and encourages open communication and resource sharing between SCSEP and other employment-related programs.

The state SCSEP office encourages local SCSEP projects to continuously develop relationships with LWDBs to represent the needs of SCSEP participants.

## F. Efforts to work with local economic development offices in rural locations.

Of Oregon's 36 counties, 14 met the SCSEP definition of persistent unemployment when the 2016-2018 tables were released in 2019. Those counties are: Baker, Columbia, Coos, Crook, Curry, Douglas, Grant, Harney, Jefferson, Josephine, Klamath, Lake, Union, and Wallowa. The Oregon SCSEP will conduct outreach to local economic development offices in these counties. Table 5 shows all Oregon counties, with the 13 urban counties in italics.

Experience Works is actively pursuing partnerships with economic development offices in rural locations to promote the benefits of hiring older workers and to learn about upcoming opportunities for SCSEP participants.

#### 2. The State's long-term strategy for engaging employers to develop and promote opportunities for the placement of SCSEP participants in unsubsidized employment. (20 CFR 641.302(e)) (May alternatively be discussed in the State strategies section of strategic plan.)

Local SCSEP projects continuously seek new host agencies and potential employers in their communities as resources for SCSEP participants. They maintain strong relationships with local employers and LWDBs to enhance collaboration with workforce partners and promote employment opportunities for older workers.

Easterseals Oregon is co-located in 12 Oregon WorkSource offices and holds MOUs with Worksystems, Inc., Clackamas Workforce Partnership, and the WDBs in Salem, Eugene, Medford, and the coastal counties. Easterseals has a successful relationship with Worksystems Inc. in Multnomah County, in which the liaison visits SCSEP twice a week to work with Employment Specialists and SCSEP participants. The co-location and liaison relationships have been instrumental in the success of the Easterseals Oregon program. Being located directly in the WorkSource offices has made available numerous resources to SCSEP participants and staff. Easterseals supports the WorkSource system by requiring all participants to enroll in the WorkSource system and work cooperatively with WorkSource staff.

Experience Works has in place MOUs and resource sharing agreements with AAAs, LWDBs, senior centers, and local WorkSource offices. These relationships help the projects remain informed of changes in the local workforce and allow them to quickly notify participants of potential employment opportunities. SCSEP projects engage with LWDBs to ensure sector partnerships in their regions include opportunities for older workers.

## 3. The State's long-term strategy for serving minority older individuals under SCSEP. (20 CFR 641.302 (c))

The Charter Oak Group's Analysis of Service to Minority Individuals, PY 2017 concluded that Oregon's SCSEP served minority individuals in relative proportion to the state's eligible population. During Program Year 2017, 17.4% of the participants in Oregon's SCSEP project were minority individuals. Census data adjusted for the eligible population show that minorities 55 and older make up 15.9% of the state's population.

Should service fall below equitable levels going forward, a strategy that has proven effective in the past is to focus outreach efforts on community groups that have frequent contact with the older adults in the target population. Developing and enhancing relationships with service groups that work with minority older adults generates interest in SCSEP and allows the program to share information through trusted resources in local communities.

Local projects conduct ongoing outreach to ensure that eligible individuals are aware of SCSEP and have opportunities to participate in the program. Some examples of specialized outreach include distributing fliers with information in Spanish, classified advertisements in minority-focused newspapers, and posters that depict minority individuals.

#### 4. A list of community services that are needed and the places where these services are most needed. Specifically, the plan must address the needs and location of those individuals most in need of community services and the groups working to meet their needs. (20 CFR 641.330)

As of July 2019, the Oregon Employment Department reports that more than sixty-seven percent of Oregon's 36 counties have unemployment rates (not seasonally adjusted) higher than the state average of 4.2%. Table 3 identifies those counties where Title V services are most needed based on the unemployment rate relative to the rest of the state. Those 24 counties have the greatest need for services that assist unemployed individuals find work.

Thirty-one percent of SCSEP participants in PY 2018 reported having a disability. The Oregon SCSEP works with OVRS to connect participants with comprehensive services to help them succeed in the job market. Also in Program Year 2018, ninety-one percent of participants had income at or below the poverty level and seventy-eight percent received some form of public assistance. These statistics suggest that organizations serving Oregonians who experience disabilities, those with low income, and individuals receiving public assistance are well positioned to coordinate with SCSEP. Oregon will continue to work with groups including the Oregon Employment Department, the Department of Human Services, and a variety of other public and private community service programs to identify, recruit, and train eligible older workers.

County	July 2019 Unemployment Rate (not seasonally adjusted)
Umatilla	6.3
Klamath	6.0
Coos	5.5
Morrow	5.5
Crook	5.4
Douglas	5.4
Jackson	5.3
Josephine	5.3

5.1
5.0
5.0
5.0
4.9
4.8
4.8
4.8
4.7
4.6
4.6
4.6
4.6
4.6
4.5
4.5
4.2
4.0
4.0
3.9
3.9
3.9
3.9
3.8
3.8
3.7
3.5
3.5
3.3

(LAUS) Multiple Area & Time Report

Source: US Department of Labor, Bureau of Labor Statistics

While Morrow county has a higher unemployment rate than the state average, there are no DOLauthorized positions in that county due to population size. Similarly, SCSEP-eligible populations in Gilliam and Sherman counties are too small to qualify for SCSEP positions under the allocation model used by DOL. For that reason, there are no active SCSEP projects operating in those three counties.

# 5. The State's long-term strategy to improve SCSEP services, including planned long-term changes to the design of the program within the State, and planned changes in the use of SCSEP grantees and program operators to better achieve the goals of the program. This may include recommendations to the Department as appropriate. (20 CFR 641.302(k))

The Oregon Department of Human Services has invested significant resources in the Aging and Disability Resource Connection (ADRC) of Oregon. The ADRC of Oregon connects individuals with local public and private community resources to help them remain as independent, healthy, and safe as possible. ADRC has professional Information and Referral (I&R) staff available to help consumers identify possible supports to address current and future needs. ADRC is a statewide resource and its services are available to all, regardless of income. ADRC is a valuable resource to assist SCSEP applicants locate and obtain supportive services in their communities. SCSEP is included in the ADRC database to ensure that older workers seeking assistance through the ADRC will be connected with SCSEP.

## 6. The State's strategy for continuous improvement in the level of performance for SCSEP participants' entry into unsubsidized employment, and to achieve, at a minimum, the levels specified in OAA Section 513(a)(2)(E)(ii). (20 CFR 641.302(f))

Oregon's SCSEP projects strive to help participants find appropriate unsubsidized employment before the end of their 48-month individual durational limit. The Q2 Employment target for Oregon's state SCSEP grant in Program Year 2018 was 33.4% and the actual rate for that period was 24.1% (72.2% of target). For Q4 Employment, the target was 28% and actual performance was 34.8% (124.3% of target). To ensure that Oregon meets or exceeds employment targets in future Program Years, the Oregon SCSEP project will focus on engaging potential employers and helping participants tailor and effectively market their skills.

## c. Location and Population Served, including Equitable Distribution

## 1. A description of the localities and populations for which projects of the type authorized by title V are most needed. (20 CFR 641.325 (d))

The program serves unemployed, low-income (no greater than 125% of the Federal Poverty Level) older workers (55 and older) who are residents of Oregon. The Oregon state SCSEP grant service area covers 16 counties statewide. Easterseals is a national SCSEP grantee that serves 18 counties around the state. After a successful administrative transfer was completed in early PY 2017, the only county in Oregon where multiple grantees operate a SCSEP project is Multnomah County.

In PY 2018, seventy-seven percent of Oregon SCSEP participants were homeless or at risk of becoming homeless, sixty-five percent lived in rural locations, and thirty-one percent experienced a disability. To address the needs of these populations, Oregon will continue to collaborate with

agencies including Self-Sufficiency and Vocational Rehabilitation in addition to private social services programs.

#### 2. List the cities and counties where the project will be conducted. Include the number of SCSEP authorized positions and indicate where the positions changed from the prior year.

Table 4 identifies the number of Program Year 2019 authorized positions in Oregon by county. There were no changes to authorized position allocations from the prior year in Oregon's SCSEP grant.

County	State Grantee	National Grantee	All Grantees
Baker	4		4
Benton		10	10
Clackamas		43	43
Clatsop		6	6
Columbia		7	7
Coos		16	16
Crook	6		6
Curry		7	7
Deschutes	27		27
Douglas		25	25
Gilliam			
Grant	2		2
Harney	2		2
Hood River	2		2
Jackson		38	38
Jefferson	3		3
Josephine		23	23
Klamath	13		13
Lake	3		3
Lane		63	63
Lincoln		12	12
Linn		20	20
Malheur	6		6
Marion		40	40
Morrow			
Multnomah	29	82	111

State Grantee	National Grantee	All Grantees
	11	11
	6	6
10		10
5		5
2		2
5		5
	50	50
1		1
	12	12
120	471	591
	10 5 2 5 1 1	11         10         5         2         5         10         5         10         11         6         10         5         10         5         1         11         12

Source: US Department of Labor, Bureau of Labor Statistics

(LAUS) Multiple Area & Time Report

## 3. Describe current slot imbalances and proposed steps to correct inequities to achieve equitable distribution.

No slot imbalances currently exist in the distribution of Oregon's authorized SCSEP positions. Individual counties that experience ongoing slot imbalances are addressed during the annual Equitable Distribution process with all Oregon SCSEP grantees.

## 4. The State's long-term strategy for achieving an equitable distribution of SCSEP positions within the State that:

## A. Moves positions from over-served to underserved locations within the State in compliance with 20 CFR 641.365.

State and national grantees work collaboratively to identify areas of the state where over-enrollment or under-enrollment exist. The state SCSEP coordinator consults with the state grant sub-recipient and the national grantee and mutual agreement is required before any positions may be exchanged. The existing distribution of positions between counties is compared with the number shown in the ED Report to identify any areas of over- or under-enrollment in the state. Participants may not be terminated from the program because of the equitable distribution requirement, so grantees rely on attrition to correct areas of over-enrollment.

#### B. Equitably serves rural and urban areas.

The definition of Rural as outlined in statute at 20 CFR 641.140 is:

An area not designated as a metropolitan statistical area by the Census Bureau; segments within metropolitan counties identified by codes 4 through 10 in the Rural Urban Commuting Area (RUCA) system; and RUCA codes 2 and 3 for census tracts that are larger than 400 square miles and have population density of less than 30 people per square mile.

Approximately sixteen percent of Oregonians live in nonmetropolitan counties. Employment opportunities and community resources are often more difficult to obtain in rural counties than in

metropolitan areas. According to the Program Year 2018 Quarterly Progress Report (QPR), 81 of the 124 participants served by Oregon's state SCSEP grant during Program Year 2018 lived in areas identified as rural. Experience Works staff travels to rural counties often meet with participants and host agencies. Experience Works publicizes their statewide toll-free phone number so that applicants and partners may easily contact their state office, no matter where they live. The Experience Works web site also refers Oregon SCSEP applicants directly to the state office to streamline the application process.

Individuals living in urban areas tend to have greater access to resources such as transportation, health services, and educational opportunities than Oregonians living in less populated regions. Computer literacy has become increasingly important for SCSEP participants and most employment opportunities now require basic computer skills at a minimum. All SCSEP participants are required to register with iMatch Skills, the state's computerized labor exchange system that matches employers with qualified candidates based on their skills and work experience.

Advances in technology continue to lower the cost of accessing the Internet, creating new opportunities for rural Oregonians that were not possible in the recent past. Experience Works and Easterseals offer computer literacy and higher-level computer skills training to SCSEP participants to help improve their employment prospects. Experience Works uses a program called JobReady that allows SCSEP participants to review their Individual Employment Plan (IEP) online any time they wish. SCSEP participants also use JobReady to complete online training courses at their own pace and earn Job Skill Certificates that can be presented to potential employers. Furthermore, participants are encouraged to access the National Career Readiness Certificate through WorkSource Oregon to demonstrate skill competency.

## C. Serves individuals afforded priority for service under 20 CFR 641.520. (20 CFR 641.302(a), 641.365, 641.520)

When recruiting and selecting participants for SCSEP, priority is given to individuals who have one or more of the following priority of service characteristics:

- Are covered persons in accordance with the Jobs for Veterans Act (covered persons veterans and eligible spouses, including widows and widowers – who are eligible for SCSEP must receive services instead of, or before, non-covered persons);
- Are 65 years or older;
- Have a disability;
- Have limited English proficiency;
- Have low literacy skills;
- Reside in a rural area;
- Have low employment prospects;
- Have failed to find employment after utilizing services provided through the One-Stop Delivery System;
- Are homeless or are at risk for homelessness

The priority of service requirements are included in the state SCSEP contract and are observed by all SCSEP grantees in Oregon. Local project staff uses their connections with other programs, such as OVRS counselors and Veterans Representatives at the WorkSource offices, to promote SCSEP and identify individuals who may meet the priority of service and eligibility requirements. Grantees partner with organizations that serve hard-to-reach populations, like those experiencing geographic or social isolation and those whose primary language is not English. Those organizations include the Northwest Seasonal Worker Association and several federally recognized tribes of Oregon.

Participants with the greatest economic need are provided supportive services, both direct and indirect. Direct services may include a gas card or a bus pass to accommodate transportation to and from their host agency assignment until they receive a paycheck. SCSEP staff utilizes resource guides, including the ADRC, to identify supportive services, such as assistance with shelter, utilities, clothing and food, which may be available to participants. Many times, those resources are provided at no cost to SCSEP or the participant.

Those with the greatest social needs are assigned to training sites that can provide a highly supportive environment. These sites may already serve clients facing similar barriers as the participants, providing a more comfortable learning environment for the SCSEP participant. The first training assignment for individuals with the greatest social need is limited in duration so SCSEP staff can monitor them closely and interact more often.

## 5. The ratio of eligible individuals in each service area to the total eligible population in the State. (20 CFR 641.325(a))

Table 5 shows the ratio of SCSEP-eligible Oregonians to the state's population, the number of individuals with the Greatest Economic Need (55 and older with income below Federal Poverty Level (FPL)), and Greatest Social Need (65 and older with a disability and income below FPL).

	Ratio of SCSEP-Eligible Population	Greatest Economic Need	Greatest Social Need
All	4%	114,089	26,735
Baker	7%	694	201
Benton	3%	1,789	327
Clackamas	3%	8,738	2,296
Clatsop	5%	1,216	278
Columbia	4%	1,366	224
Coos	7%	3,124	1,024
Crook	6%	774	127
Curry	10%	1,425	348
Deschutes	4%	5,605	1,191
Douglas	6%	4,103	1,160
Gilliam	7%	93	6
Grant	6%	231	110
Harney	8%	397	32
Hood River	3%	503	95
Jackson	5%	7,664	1,354
Jefferson	5%	723	115
Josephine	8%	4,795	958
Klamath	5%	2,253	534
Lake	10%	453	159
Lane	5%	12,416	2,878

	Ratio of SCSEP-Eligible Population	Greatest Economic Need	Greatest Social Need	
Lincoln	8%	2,502	505	
Linn	5%	3,863	779	
Malheur	6%	969	300	
Marion	3%	7,220	1,801	
Morrow	3%	253	60	
Multnomah	4%	23,423	5,626	
Polk	3%	1,804	420	
Sherman	7%	73	14	
Tillamook	6%	969	167	
Umatilla	4%	2,083	577	
Union	4%	705	196	
Wallowa	7%	304	67	
Wasco	5%	881	196	
Washington	2%	8,451	2,103	
Wheeler	13%	109	25	
Yamhill	3%	2,118	482	
Urban	4%	89,252	20,439	
Rural	6%	24,837	6,296	

Source: U.S. Census Bureau, American Community Survey, 2013-2017 5-year estimates, Table B17024 and Table C18130.

These estimates are subject to a margin of error, and margins of error can be large for small populations and less populated counties.

#### 6. The relative distribution of eligible individuals who:

#### A. Reside in urban and rural areas within the State

Sixty-five percent of Oregon SCSEP participants in Program Year 2018 lived in urban areas, while thirty-five percent resided in rural Oregon. Urban counties are shown in italics in Table 5.

#### B. Have the greatest economic need

See Table 5.

#### C. Are minorities

Race and Ethnicity	Total Population	Population 55+ Income < FPL
All	3,947,954	114,089
Hispanic or Latino Origin	498,708	6,315

Race and Ethnicity	Total Population	Population 55+ Income < FPL
American Indian or Alaska Native	43,674	1,737
Asian	162,923	4,259
Black or African American	72,590	3,401
Native Hawaiian or Pacific Islander	14,678	213
Two or More Races	177,327	3,580

Metropolitan and nonmetropolitan are defined here by county boundaries.

Source: U.S. Census Bureau, American Community Survey, 2013-2017 5-year estimates, Table B17001

#### D. Are Limited English Proficient

All Languages	English Sp	· .		Asian and Pacific Island Languages
	344,73648		6 6	16,516

Source: U.S. Census Bureau, American Community Survey, 2013-2017 5-year estimates, Table B16009

These estimates are subject to a margin of error, and margins of error can be large for small populations and less populated counties.

E. Have the greatest social need. (20 CFR 641.325(b))

See Table 5.

7. A description of the steps taken to avoid disruptions to the greatest extent possible, when positions are redistributed, as provided in 20 CFR 641.365; when new Census or other reliable data become available; or when there is over-enrollment for any other reason. (20 CFR 641.325(i), 641.302(b))

To avoid service disruptions for participants, SCSEP follows guidance from the US DOL when discrepancies in enrollment levels exist. The strategies recommended by the US DOL to manage over-enrollment include stopping new enrollments and adjusting hours for current participants.

#### Housing and Urban Development (HUD) Employment and Training Activities

There are no program-specific state planning requirements for HUD employment and training programs. If the state includes HUD employment and training programs in a Combined State Plan, the state must incorporate such HUD programs in its responses to the common planning elements in sections II, III and IV of the WIOA State Plan requirements instrument.

HUD considers such employment and training activities to include the following: Community Development Block Grant program, Continuum of Care, Family Self-Sufficiency program, Jobs Plus

program, and Resident Opportunities and Self-Sufficiency program.

## Performance Indicator Appendix All WIOA Core Programs

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

#### All WIOA Core Programs

Performance Indicators			PY 2021 Expected Level	PY 2021 Negotiated Level
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> "Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

#### Additional Indicators of Performance

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

Additional Indicators of Performance					
Not applicable.					

#### **Other Appendices**

Not applicable.