



# Oregon WIOA Combined State Plan

2024-2027

**DRAFT**  
**For Public Comment**

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## 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)) 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.) o 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>

### **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

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<sup>1</sup> 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.

ongoing program development and coordination. Operational planning elements include:

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

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations.<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. Use of links to external websites and documents is permitted within the State Plan narrative submission, if such links remain active and adhere to Section 508 accessibility requirements.

**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.

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<sup>2</sup> Target populations include individuals with barriers to employment, as defined in WIOA Sec. 3, as well as veterans, unemployed workers, and youth.

## **INTRODUCTION**

## **I. WIOA STATE PLAN TYPE and INTRODUCTION**

- (a) **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.
- o **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. Indicate which Combined State Plan partner program(s) the State is electing to include in the plan.
    - o 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.)
    - o 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)))
    - o 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.))
    - o Jobs for Veterans State Grants program (programs authorized under 38, U.S.C. 4100 et. seq.)
    - o 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.))
    - o 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.))
    - o Reintegration of Ex-Offenders program<sup>3</sup> (programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

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<sup>3</sup> The Reentry Employment Opportunities program (REO), formerly the Reintegration of Ex-Offenders Program (RExO), is referred to by its original name (RExO) in this document. This name change is a recent decision that was not incorporated into WIOA.

(b) **Plan Introduction or Executive Summary.** The Unified or Combined State Plan may include an introduction or executive summary. This element is optional.

#### Introduction to Oregon's 2024-2027 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 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.

## **STRATEGIC ELEMENTS**

## **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. Where requirements identify the term “populations”, these must include individuals with barriers to employment as defined at WIOA Section 3. This includes 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; 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. Additional populations include veterans, unemployed workers, and youth, and others that the State may identify.

- (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

After two years of consistent job growth during recovery from the pandemic recession, the pattern of monthly job growth in Oregon was mixed in 2023. Between November 2022 and November 2023, Oregon lost jobs from nonfarm payrolls in about half of all months and added jobs in the other half of all months. Still, Oregon employers added 39,600 jobs to nonfarm payrolls over the past year, an increase of 2.0%. More than half (21,600 or 55%) of those gains occurred in January 2023 alone. Since then, employment grew by a modest 10,500 over the most recent 10 months; that's an average monthly gain of 1,050 jobs.

Oregon's unemployment rate returned to record low territory in 2023. The rate was 3.4% in July and August 2023, matching the all-time low dating back to 1976. Oregon's historical average unemployment rate is 6.3% over the past two decades. The current level of low unemployment presents much tighter labor force conditions than typical for the state. The U.S. unemployment rate was also low in 2023, ranging between 3.4% and 3.9% during the year.

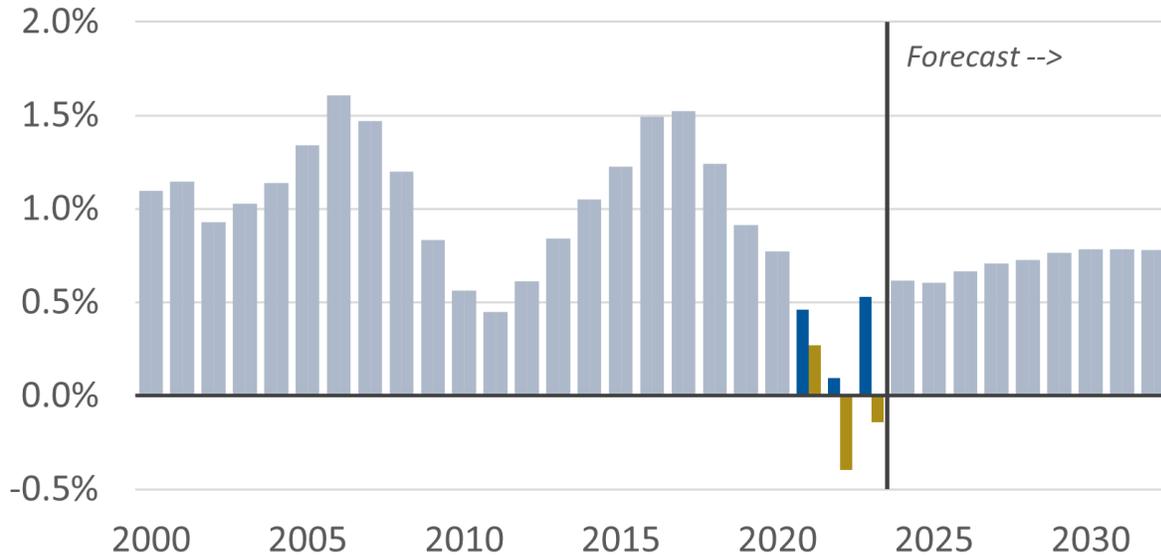
Oregon's economy faces many of the same demographic challenges seen across the nation, such as the aging of the workforce and baby boomer retirements, and slower job growth in rural areas. In the 1990s, one out of every 10 jobs in Oregon was held by a worker age 55 and older. By 2022, one out of every four jobs in the state was held by a worker at least 55 years old. Population growth has driven labor force growth in recent years. This is a result of natural increase (births minus deaths) and to a larger extent, net in-migration from other states and areas. While Oregon has historically been a leading state in terms of population growth, that trend changed in recent years.

U.S. Census Bureau estimates show Oregon's population declined by 23,000, or -0.5%, between 2021 and 2023. At the same time, estimates from Portland State University's Population Research Center The difference between the population estimates stands at 57,000.

# Oregon Population Growth

Annual change in total state population

OEA History and Forecast, **Portland State Estimates**, **Census Estimates**



Latest: 2023 | Source: Census, Portland State Population Research Center, Oregon Office of Economic Analysis

Despite the differences between these estimates, they tell a similar story: Oregon’s population has either slowed notably or declined outright for the first time since the 1980s. If Oregon’s labor force does not grow amid stagnating population, that can affect the state’s job growth potential in the future.

Greater labor force participation among existing residents – or greater use of remote workforce living elsewhere – could offset some population slowdown or decline in the state. Oregon’s labor force growth was strong following the pandemic recession. In 2023, the size of the labor force averaged 2.16 million people, a 3% increase from the pre-pandemic level of 2.10 million in 2019. However, the size of Oregon’s labor force last peaked in January 2023 at 2.19 million and declined slightly before stabilizing in the latter part of 2023.

At 61.8%, Oregon’s labor force participation rate was slightly higher in November 2023 than in January 2020 (61.1%) before the pandemic recession. The state’s labor force participation rate declined throughout much of 2023 though, last peaking at 63.0% in January 2023.

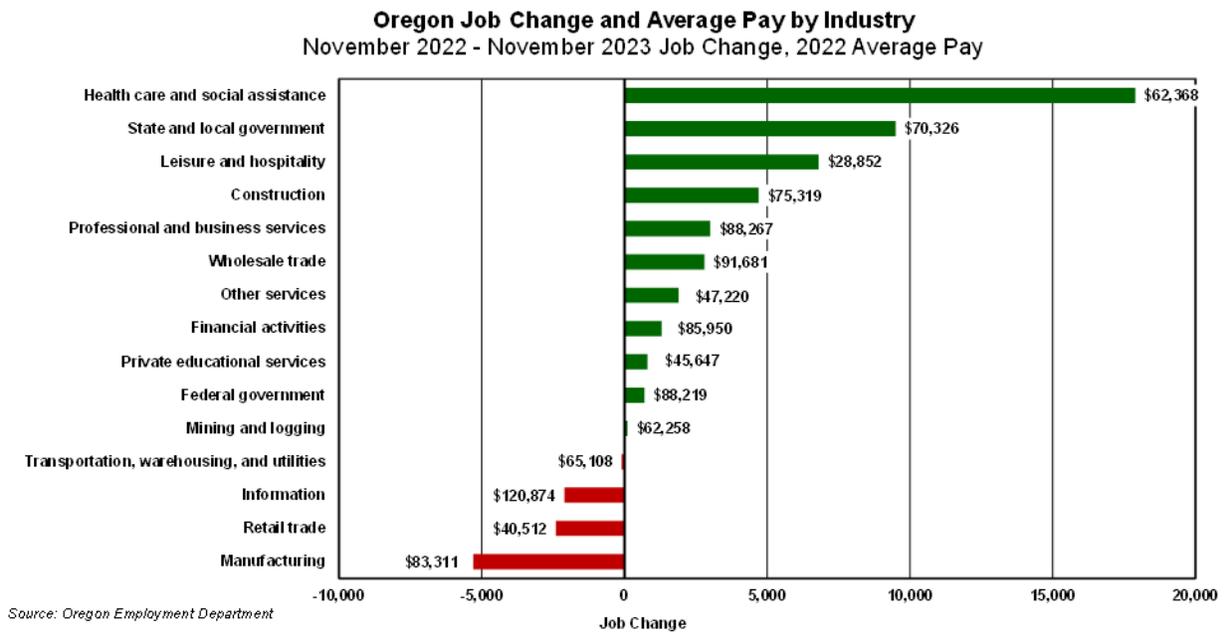
## Oregon’s Economic Analysis

Graph 1 shows the number of jobs by industry added during the previous year and the average annual pay in those industries in 2022. The gains have been in industry sectors with high-, middle-, and low average annual pay. Health care and social assistance added 17,900 jobs, the

most for any sector. Other sectors driving Oregon’s job growth include state and local government (9,500), leisure and hospitality (6,800), and construction (4,700).

Two broad sectors had notable job losses over year. Oregon’s manufacturers lost 5,300 jobs, with nearly all those declines occurring in durable goods manufacturing. Retail trade employment fell by 2,400 jobs.

Graph 1. Oregon Job Growth and Average Pay by Industry Comparing November 2022 to November 2023 and Displaying 2022 Average Pay.



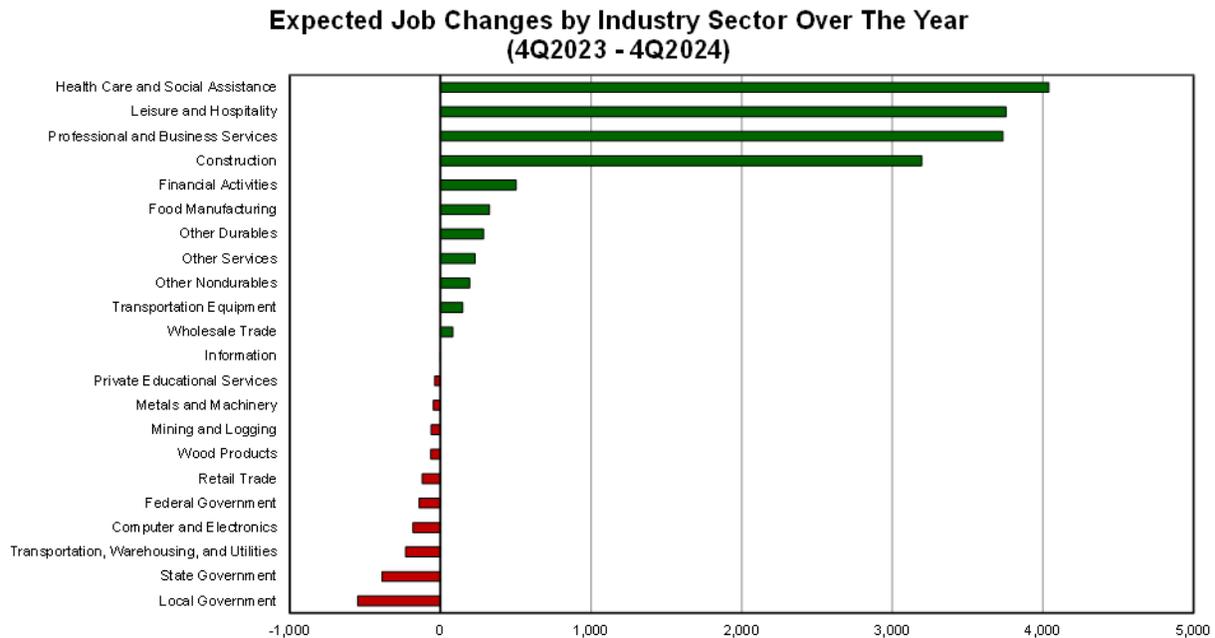
Graph 2 shows the projected net job change from the fourth quarter of 2023 to the fourth quarter of 2024. The Office of Economic Analysis forecasts relatively slow job growth, with a net gain of 14,700 total nonfarm payroll jobs in Oregon. This would be a continuation, similar to the job growth trend that occurred in Oregon during the most recent 10 months, from February to November 2023.

OEA expects net job gains between the fourth quarters of 2023 and 2024 across about half of all major industries, while the other half are expected to have either no change or experience job declines. Among the industries expected to grow, health care and social assistance will add the most jobs (4,000), followed by leisure and hospitality (3,800), professional and business services (3,700), and construction (3,200).

Declining industries over the next year are expected to experience relatively small reductions. The Office of Economic Analysis forecasts a loss of 550 jobs in local government, and a decline of 390 jobs in state government. Transportation, warehousing, and utilities is projected to lose

230 jobs. This sector has experienced reductions after its job growth surged during the pandemic.

Graph 2. Expected Job Changes by Industry Sector Over the Year Comparing the Fourth Quarter of 2023 to the Fourth Quarter of 2024.



Source: Oregon Employment Department analysis using Oregon Office of Economic Analysis Forecast, December 2023

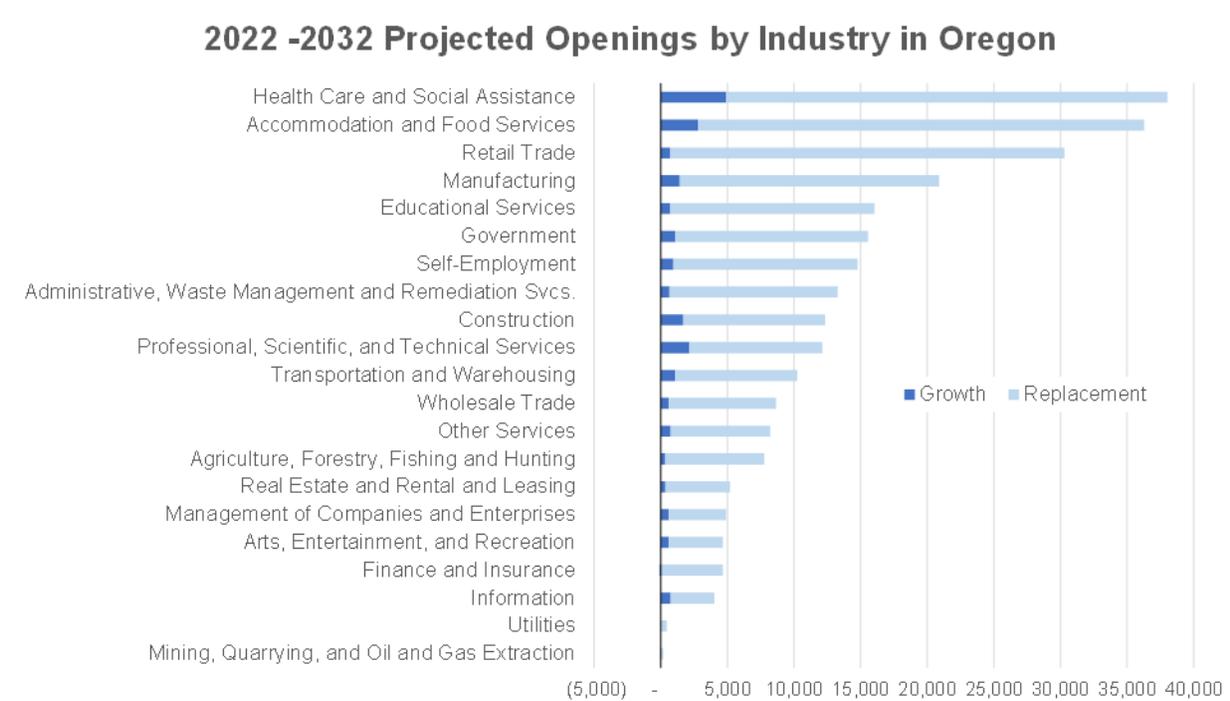
In the longer term, projections by the Oregon Employment Department indicate that Oregon will have about 22,000 job openings each year due to economic growth between 2022 and 2032. These job openings are a net gain from new or expanding businesses adding jobs in Oregon. As workers progress in their careers, they may change occupations. This creates additional job openings when 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 job openings due to workers leaving the labor force, largely due to retirements, or making major occupational changes. Far more workers are needed to fill replacement openings – an average of 247,000 per year – than for “growth openings” that are due to net job growth. Even in some industries and occupations with little anticipated net job growth, replacement openings can be numerous.

Projected growth and replacement job openings by industry are shown in Graph 3. Health care and social assistance will have the most openings through 2032, but of the 38,000 expected openings each year, 87% 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 2022-2032 of Average Annual Job Openings by Industry in Oregon.



Source: Oregon Employment Department

- (B) **Workforce Analysis.** The Unified or Combined State Plan must include an analysis of the current workforce in the State and within various state regions. Provide key analytical conclusions in aggregate as well as disaggregated among populations to identify potential disparities in employment and educational attainment and understand labor force conditions for items (i)-(iii) below. Populations analyzed must include individuals with barriers to employment described in the first paragraph of Section II. Analysis must include—
- (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) **Comparison of Economic and Workforce Analytical Conclusion.** Describe areas of opportunity for meeting hiring, education, and

skills needs identified in the economy compared to the assets available in the labor force in the state.

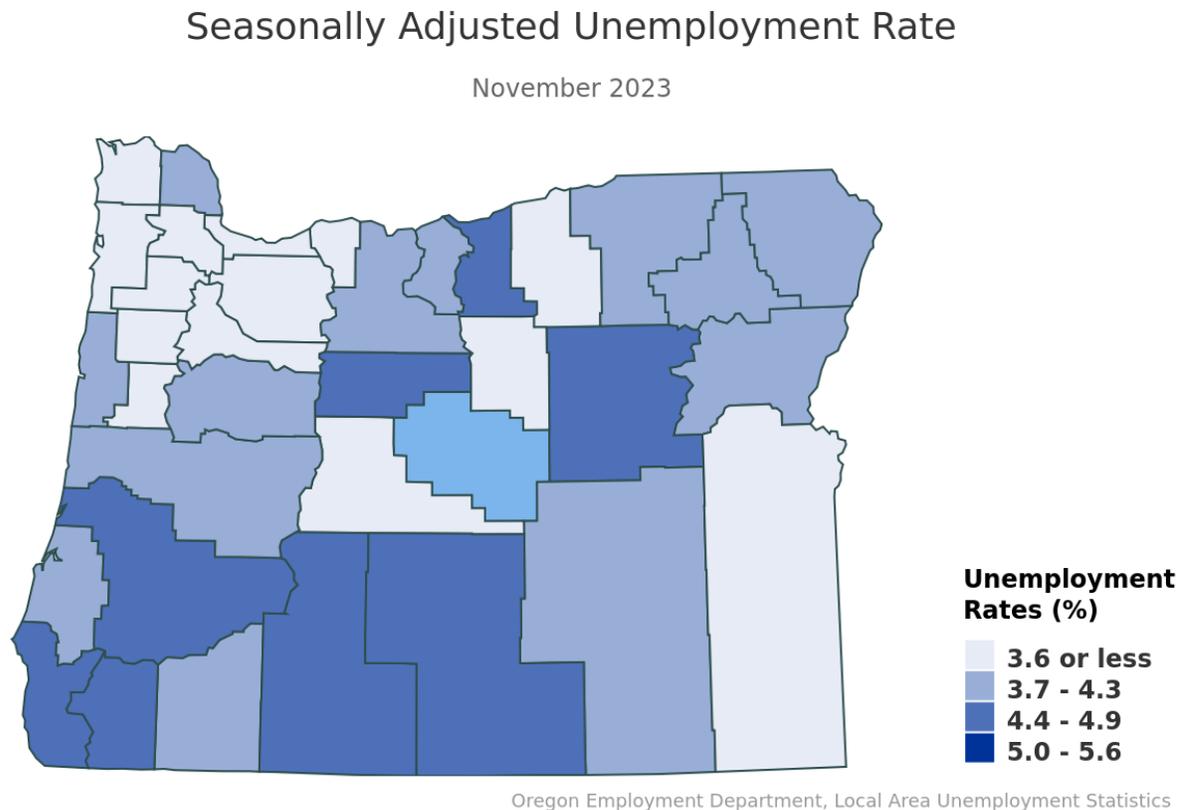
### Oregon's Workforce Analysis

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 1.36 million people. Because Portland's economic region crosses the state border, many workers in Oregon live in Washington. In 2021 there were about 84,000 people working in Oregon who lived in Washington. The area's 3.5% unemployment rate was about the same as Oregon's statewide rate (3.6%) in November 2023.

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 3.6%, and Salem is also at 3.6%. The unemployment rate in Eugene is 3.8%, Albany is 3.9%, Medford is 4.1%, and Grants Pass is 4.8%. Although the unemployment rate is higher in Grants Pass, it is near the record low for the area. The exception is the Corvallis metro area, which is economically buoyed by Oregon State University. At 3.0%, Corvallis has the third-lowest unemployment rate in the state.

Unemployment tends to be higher in the eastern and southern regions of the state. Crook County in central Oregon has the highest rate at 5.7%. Other counties with relatively high unemployment include Klamath County (4.9%), Lake County (4.8%), Josephine County (4.8%), and Grant County (4.8%). Overall, non-metro area unemployment was 4.9% in November 2023.

Figure 1. Map of Oregon Counties showing the Seasonally Adjusted Unemployment Rate for November 2023.



**Key Labor Market Trend - Strong Hiring Demand Among Oregon Employers:**

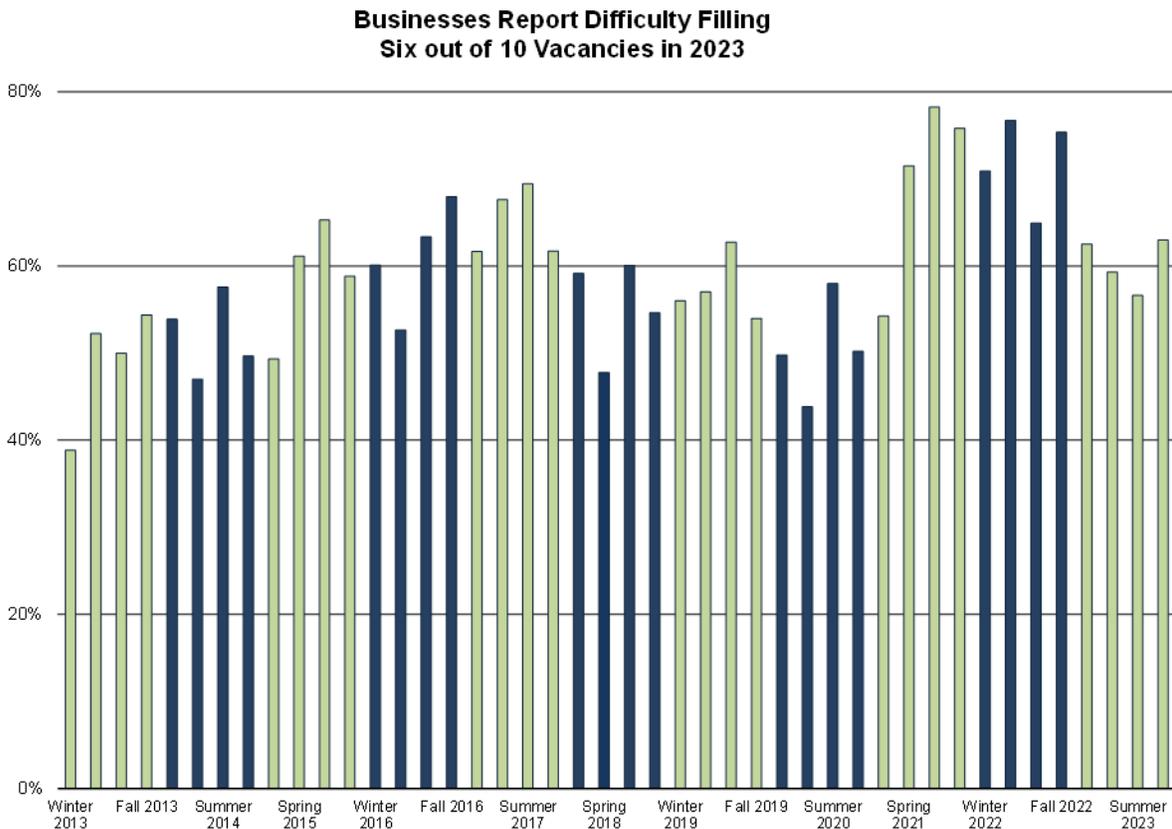
Throughout the year, the Oregon Employment Department surveys private employers from all industries and areas of the state to ask about the job vacancies they are actively trying to fill. Employers provide the job title, starting wage, and education and experience requirements for each of their vacancies. 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 also includes an open-ended question about employers' difficulty filling their job openings.

During the recovery from the pandemic recession, Oregon experienced rapid recovery, adding back all 280,000 jobs that were lost in slightly less than three years. Oregon saw record levels of job openings during the recovery period. Private employers averaged about 100,000 job openings at any given time between spring 2021 and the middle of 2022. Record numbers of job openings and rapid hiring brought unemployment down rapidly as well. Oregon's unemployment rate declined by more than 10 percentage points, from a high of 13.7% in April 2020 to 3.6% in April 2022.

While the number of job openings eased in 2023, hiring demand remained elevated, with an average of 70,500 job openings at any given time in the first nine months of the year. Oregon’s unemployment rate also remained low by historical standards, staying at or below 4.0% most of the year.

Competition among employers for workers over the past few years drove up the average starting wage for jobs. The real (inflation-adjusted) average starting wage offered for private job vacancies in Oregon rose by 31% between the spring of 2021 and spring of 2023. Low unemployment and competition for workers also resulted in record difficulty filling job vacancies. For most of 2021 and 2022, employers reported seven out of 10 job vacancies as difficult to fill. This also eased slightly in 2023; yet employers still reported six out of 10 job openings as hard to fill.

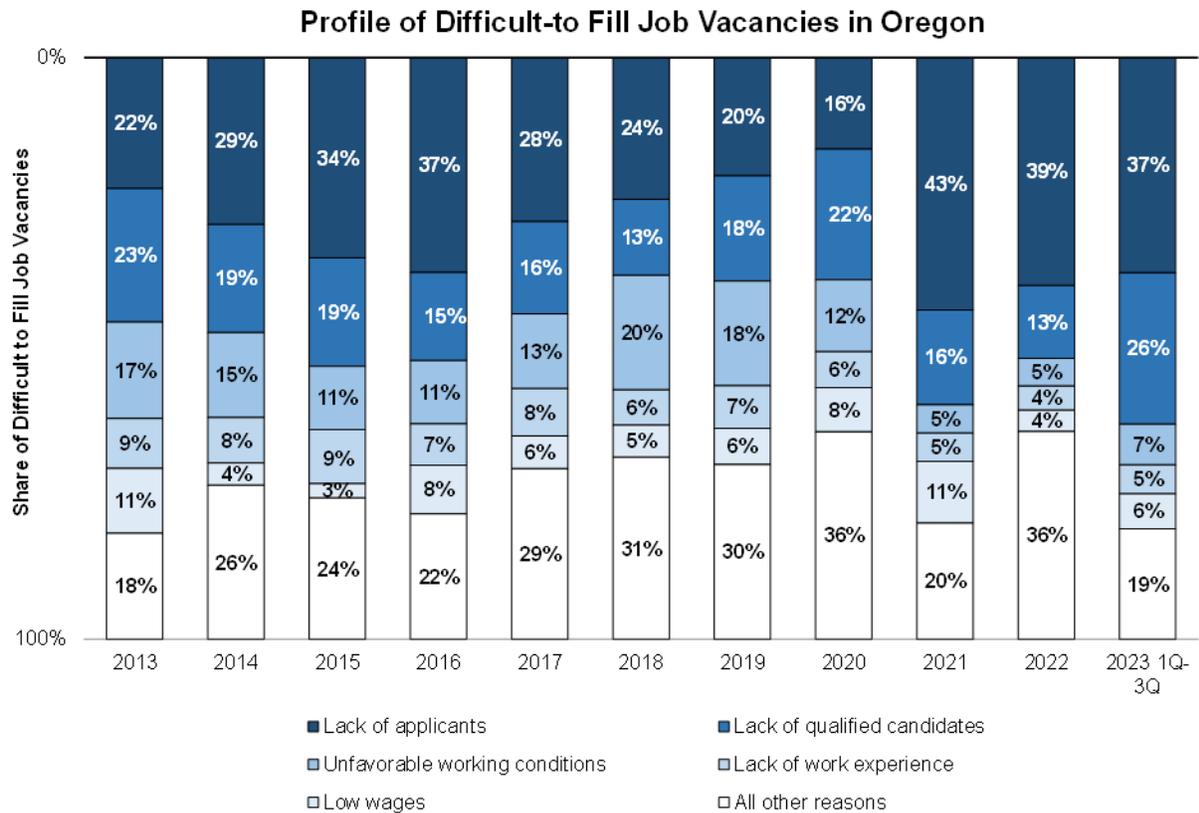
Graph 4. Difficult-to-Fill Share of All Job Vacancies in Oregon for 2013 through the Third Quarter of 2023.



With continued hiring demand for workers, and ongoing low unemployment, the most commonly cited reason for difficulty filling job openings was a lack of applicants. In the first nine months of 2023, Oregon’s private employers had about 42,600 job openings that were hard to fill. For 37%

of those vacancies, they reported having too few or no applicants. A slightly smaller share of hard-to-fill job openings had a lack of applicants in the first three quarters of 2023 than in 2022 (39%) or 2021 (43%). Prior to the pandemic recession, one out of five (20%) of all job openings with private employers were reported as hard to fill due to a lack of applicants.

Graph 5. Difficult-to-Fill Job Vacancies by Reason in Oregon for 2013 through the Third Quarter of 2023.



Source: Oregon Employment Department, Oregon Job Vacancy Survey

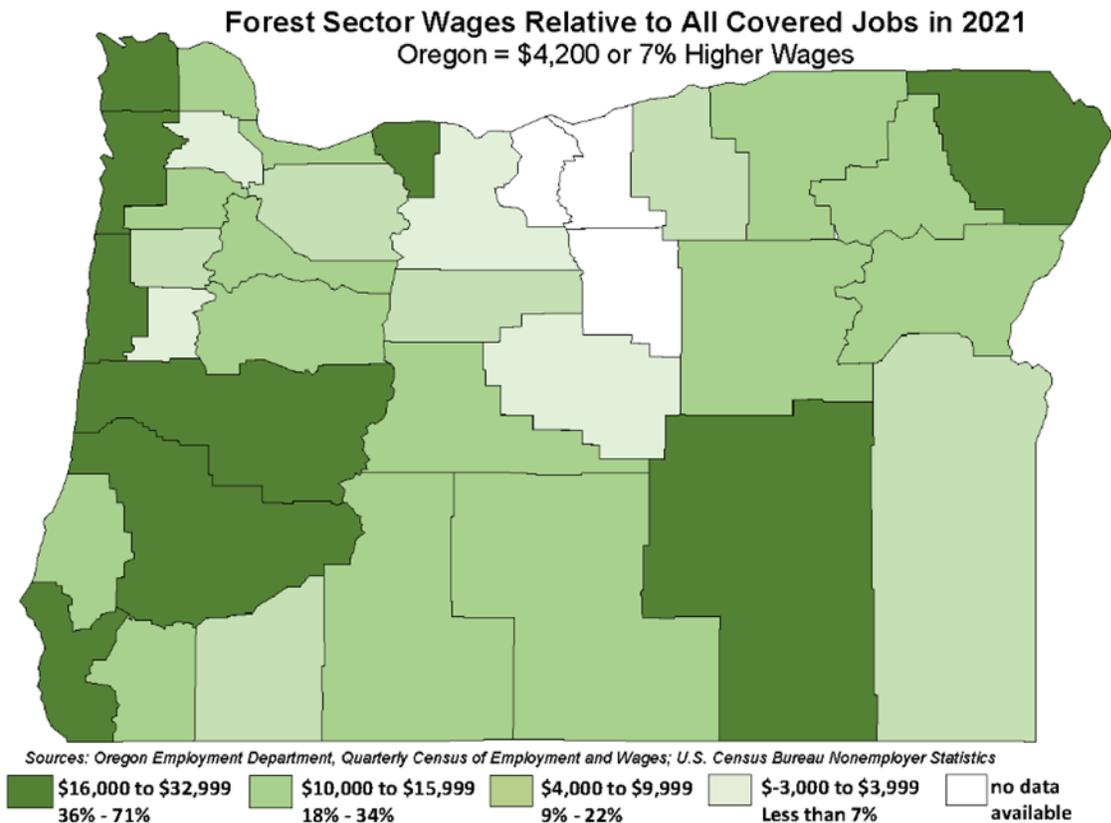
**Key Labor Market Trend - Forest Industry Sector:**

Forest sector-related employment in Oregon totaled 62,000 in 2021, which accounted for 3% of Oregon’s workforce. Forest-related jobs paid relatively well, with an annual average wage of \$68,200, roughly 7% more than the \$64,000 average wage for all jobs covered by unemployment insurance in 2021.

Although metros accounted for twice as many of these jobs, forest sector employment made up 7% of all rural employment, compared with 2% of all metropolitan area employment. In Grant County, one out of every five jobs (20%) were forest related. The sector accounted for more than 10% of total employment in Crook, 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 40% more. Meanwhile, forest sector jobs in rural areas paid as much as 71% more than the average for all jobs. That was the case in Clatsop County, where forest sector jobs paid an average of \$77,900, compared with \$45,500 for all jobs. Lincoln County was similar, with an average annual forest sector wage (\$76,000) that was 65% above the all-job average (\$46,000).

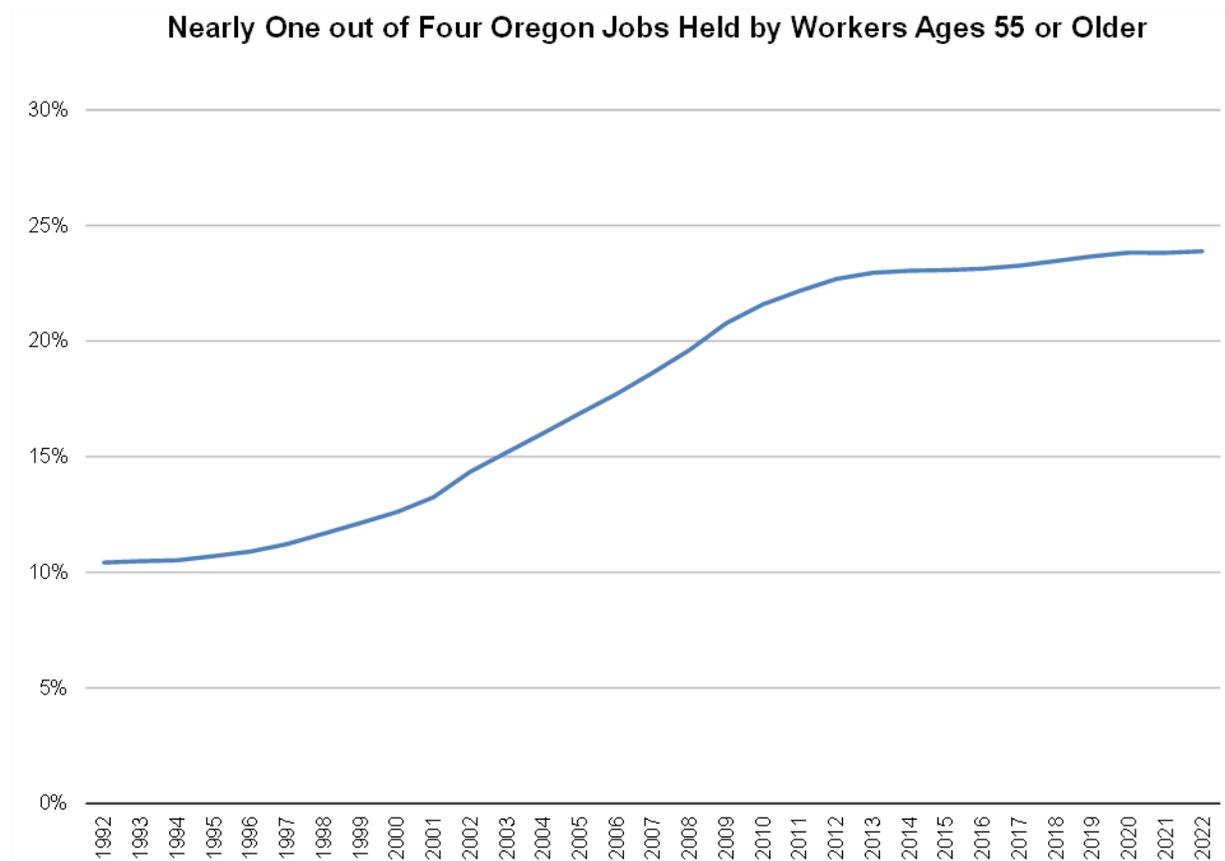
Figure 2. Map of Oregon Counties showing the Forest Sector Wages relative to All Covered Jobs in 2021. All Covered Jobs in Oregon is \$4,200 (or 7%) Higher.



**Workers with Barriers - Older Workers:**

Baby boomers have dramatically changed the age structure of Oregon’s workforce. In the early 1990s, about 10% of all jobs in Oregon were held by workers ages 55 and older. By 2022, that share increased to 24%. The entire Baby Boomer Generation, born 1946 to 1964, is now 55 and older, and they are more likely to be in the labor force than previous generations were at ages 55 and beyond.

Graph 6. The Share of Oregon Workers Who are 55 or Older between 1992 and 2022. Nearly One out of Four Workers in Oregon is 55 or Older.



The number of workers in Oregon who were 55 years and over reached nearly 456,000 in 2022. Of those workers, more than 147,000 were 65+ years old, and working past the historically 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. The relatively young accommodation and food services sector has 17% of jobs held by workers ages 55 and over. By contrast, one out of three jobs (33%) in the mining and quarrying sector are held by workers 55 and older. Although natural resources, utilities, and real estate have higher concentrations of older workers, they employ fewer workers than many industries and are expected to require relatively fewer replacement workers. Some employers in industries with many workers 55 years and older may struggle to a greater degree to find enough workers if they do not plan ahead.

Health care (both private and public) stands out for the size of its aging workforce, with nearly 70,000 workers ages 55 and over. Other industries with many workers nearing retirement age include manufacturing (49,000 workers), retail trade (48,000), and private and public

educational services (38,000). Employers in these and in all other industries need to plan for how they are going to attract replacement workers, especially for jobs that require significant training.

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 (22%), Multnomah County (22%), Union County (23%), and Deschutes County (23%).

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

Long-term unemployed are those who have been unemployed for at least six months. Over the past two decades, the number of Oregonians who were unemployed long term has been as low as 11,000, and as high as 102,000 following the Great Recession.

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 low recently, averaging 17,000 over the past year. That's less than one-fifth of the long-term unemployment peak reached in 2010. Still, even amid low unemployment rates in Oregon, one out of seven unemployed Oregonians has been unemployed for six months or longer.

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

The population of Oregon has grown to slightly more than 4.2 million. Our median age is slightly higher than the national average, at 40.1 years, compared with 39.0 years across the U.S. More than nine out of 10 (91.6%) Oregonians ages 25 and over have completed high school or more education, a slightly higher rate than the 89.6% in the U.S. More than one-third (36.3%) of the Oregon population age 25 and over have at least a bachelor's degree.

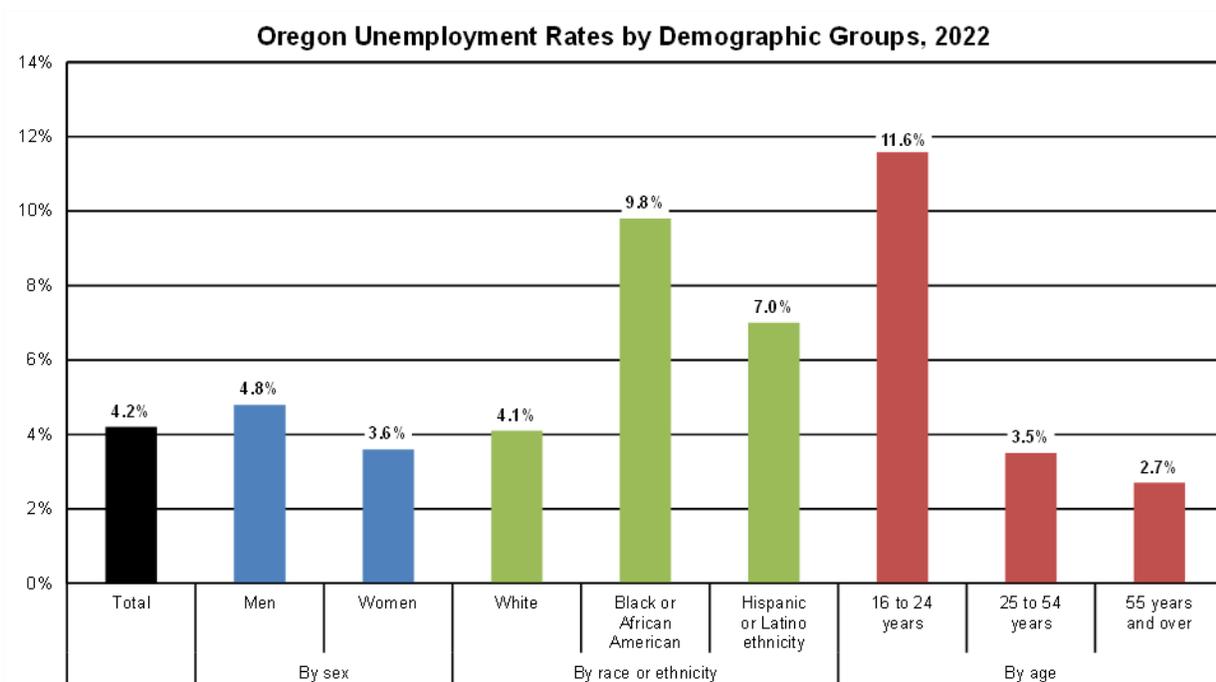
Oregon's population has become more racially diverse over the last two decades but continues to have a much larger share of the population reporting their race as "white alone" than the national average. In 2022, whites accounted for 74% of Oregon's population, compared with 61% of the population across the U.S. In Oregon, Asians made up close to 5%, Black and African American Oregonians accounted for 2% of the state's population, and other races made up the remaining 19%.

Oregon's population has also grown more ethnically diverse, as seen in the growth of the Hispanic population over the last two decades. By 2022, Hispanics and Latinos made up 14% of Oregon's population. This compares with 19% of the United States' population, indicating that Oregon still has a small Hispanic population relative to the national average.

Just about 10% of Oregonians in 2022 were born in another country. Nationally, foreign-born residents make up 14% of the population. English is by far the most prevalent language in Oregon. In 2018, 85% of residents were accustomed to speaking only English at home, compared with 78% nationally. Nine percent of residents speak Spanish at home, and 3% percent speak an Asian or Pacific Island language at home.

Unemployment rates returned to low rates in the recovery from the pandemic recession. They varied notably for some demographic groups in 2022 by race and ethnicity in Oregon. Graph 7 shows the state’s unemployment rates by race and ethnicity. Overall, Oregon’s unemployment rate was 4.2% in 2022. Unemployment rates were notably higher for workers ages 16 to 24 (11.6%), as well as for Black or African American workers (9.8%).

Graph 7. 2022 Annual Average Unemployment Rate by Race and Ethnicity for Oregon



Source: Bureau of Labor Statistics, Current Population Survey

**Workers with Barriers - Veterans:**

In Oregon, some veterans have significant barriers to employment related to being homeless, low income, lack of high school diploma/GED, offenders, 18–24-year-olds, Vietnam era/older workers, disabled veterans, and living in rural areas.

About 252,000 veterans lived in Oregon in 2022. The American Community Survey estimates that 72.1% of veterans ages 18 to 64 were in the labor force in 2022. This labor force participation rate was lower than nonveterans in Oregon (78.4%) and veterans nationally (77.1%).

The unemployment rate for Oregon veterans was 3.6% in 2022, according to the Current Population Survey. This rate was lower than the unemployment rate for nonveterans, which was 4.1% in the same period. In the U.S. more broadly, veterans had a lower unemployment rate than their Oregon counterparts at 2.8%.

Veterans were more likely to have a disability, but slightly less likely to be in poverty than the general population. Around 36% of veterans ages 18 years and older had a disability in 2022, more than double the rate for nonveterans (16.9%). In the same period, however, 9.2% of veterans lived below the poverty level, below the 11.9% poverty rate among nonveterans. Of the Oregon veterans living in poverty, 43.7% reported having a disability. Among veterans above the poverty line, only 35.2% had a disability.

Only 8.0% of Oregon veterans were under the age of 35 in 2022, compared with 29.8% of nonveterans. This older age profile may partially explain why veterans have a lower labor force participation rate, a higher median income, and higher disability rates than nonveterans.

As of January 2023, Oregon had an estimated 20,10 experiencing homelessness on any given day, as reported by Continuums of Care to the U.S. Department of Housing and Urban Development (HUD). Of that total, nearly 1,600 were Veterans.

### **2022 Oregon Talent Assessment:**

In spring 2022, 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 in-demand 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 2022 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 2022 Assessment's key findings:

1. The end of strict social distancing requirements and the ongoing effects of robust federal stimulus created a highly unusual labor market. The labor market is emerging from the influence of the highly unusual times the public health crisis and federal response created an intersection of employers rapidly attempting to scale up their operations and prospective workers who, for a variety of reasons, have become more selective about

the work they do. Job openings spiked in 2021 while quit rates reached recent highs. Nationally, labor force participation rates were still below pre-pandemic levels in late 2021 as some potential workers cared for family members and others drew on savings that accumulated during the previous two years. As this report is published, Oregon's labor market appears to have nearly recovered from most pandemic-related disruptions. By April 2022, the state's labor force participation rate exceeded pre-pandemic levels and was more than a percentage point above the U.S.

2. Employers have boosted wages to attract and retain workers. Oregon average wages have increased 17 percent since before the pandemic, but recently inflation has eroded purchasing power inflation-adjusted wages increased only 5 percent during the past two years. National data show the strongest gains for the lowest paid workers the lowest 20 percent of earners experienced a 6.4 percent increase during April 2021-2022 compared with an overall increase of 4.7 percent.
3. Conditions that pre-dated the pandemic will contribute to labor shortages going forward. Oregon and the nation face at least two broad labor market challenges: a sustained period of forthcoming retirements and relatively low labor force participation rates among so-called prime age workers. Economists and demographers have long anticipated the retirement trend, which is tied to the aging of the Baby Boom generation and has different implications across industries.
4. Robust analysis of relationships between skill requirements of occupations can suggest opportunities for displaced workers and for supporting the state's strategic workforce investments. Skills maps, pipeline analyses, and other tools can be used to uncover high-level patterns, as well as provide detailed information, to inform workforce strategy as the state recovers from the COVID-19 pandemic and beyond. For example, analyses for this assessment confirmed the longstanding constraints in the market for healthcare workers, such as registered nurses and dental assistants, and suggested that credentials awarded in Oregon that are associated with technology occupations appear to far outnumber the anticipated number of openings in the relevant occupations. These findings suggest the likely need for different approaches to addressing apparent workforce challenges in these two Future Ready industries.
5. Most employers say their existing workforce has the skills needed to perform their jobs. Nearly 7-in-10 employer survey respondents view their existing workforce as fully proficient. The 30 percent reporting not-fully-proficient signal a lack of specific occupational skills, soft/interpersonal skills, and work experience.
6. About 84 percent of respondents report difficulties finding qualified applicants for open positions. Unsurprisingly given the surge in openings and increase in quits, a large majority of employers found it difficult to hire during 2021. Employers were satisfied with applicants' basic skills and degree completion but, as in the 2018 report, they reported a lack of occupation-specific skills, advanced skills, relevant work experience, and soft/interpersonal skills. The difficulty in hiring increased the workloads of existing staff and lowered productivity.
7. Employers aim to diversify their workforce. Nearly 75 percent of employer respondents are actively trying to diversify their workforce, though sectors experiencing staffing crises may be less focused on diversity during the current period of staffing urgency. Most

employers note that hiring racially diverse candidates is more difficult than hiring gender-diverse candidates, though the historically male-dominated fields of construction, advanced manufacturing, and wood products noted greater difficulty hiring for gender diversity.

8. The pandemic has had mixed effects on skill development. Employers report that the pandemic reduced access to hands-on learning, particularly for career and technical education (CTE) students, college science majors, and healthcare trainees, which has slowed the speed with which employees become fully proficient in the workplace. At the same time, employers report that the pandemic increased the demand for and growth in the following: digital skills, due to the pivot to technology-intensive work environments; leadership skills, as managers learned to lead in an unpredictable environment and care for employees' wellbeing; and soft skills, as employees rallied in a time of crisis and showed empathy for their coworkers and/or essential workers.
9. An aging workforce, employee resignations, and employee mental health are key management concerns for employers. Most employer respondents anticipate the challenges that come with an aging workforce – almost a quarter of Oregon workers are 55 or older and that's up from about 10 percent in 1990. The pandemic has added new concerns about turnover, mental health, and well-being given increased workloads and health concerns that employees face at home.
10. Oregon's high cost of living, especially housing, is affecting the ability to hire. Sizable shares of employers say the costs of housing, childcare, and transportation are affecting their ability to hire. The limited housing supply and the high cost of living were the most problematic – 76 percent reported a high or moderate impact on hiring.

(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>4</sup> and optional one-stop delivery system partners.<sup>5</sup>

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<sup>4</sup> 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.

<sup>5</sup> 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. The [WSO Operational Standards](#) have since been updated again effective June 9, 2023.

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 Oregon Housing and Community Services Department, 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. While the Trade Adjustment Assistance for Workers program has been fully integrated into WSO Centers the other new programs have not.

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 the 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" (in-person or virtually) 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 job seekers 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 include those defined under WIOA 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.

#### **Trade Adjustment Assistance (TAA) for Workers Activities:**

The TAA for Workers program education and training activities include:

- Technology for Underserved Communities which includes digital inclusion activities: acquiring internet services, computer laptops, digital literacy training and technical support.
- Remedial & Pre-requisite classes include GED (General Education Diploma), ESL (English as a Second Language), or ABE (Adult Basic Education). Prerequisite

education is course work the training provider requires to get into the approved training program.

- Classroom Training that leads to a certificate, degree, or higher level of education.
- Work-Based Learning - On-the-Job Training (OJT, Registered Apprenticeship through Journeyman level).

An evaluation of Oregon's TAA for Workers program PIRL data shows that around 57% of the state's trade-affected dislocated workers fall into at least one Underserved Communities group, as defined by the [State of Oregon Equity Framework](#). While job loss due to foreign trade is devastating to both individuals and communities, trade related layoffs might have a more significant impact on historically underserved communities. For this reason, Oregon's TAA for Workers program targeted outreach to worker groups that have shown low levels of engagement in recent years to try to re-engage them with services. The outreach goal is to re-engage them with TAA for Workers program services that provide equitable technology access to minorities and underserved populations, economically and technically disadvantaged communities, and those in rural areas living in technology deserts to re-engage the laid off worker with the education and skills needed to re-enter Oregon's workforce.

To assist trade-affected workers' reemployment as soon as possible following a separation, each training plan must be evaluated to meet all 6 TAA for Workers program training criteria below to be approved for classroom training. As a required WorkSource partner, the TAA for Workers program's efforts to gather this information is done in cooperation with the state, LWDBs, local employers, and Oregon's labor market information.

- Criterion 1. There is no suitable employment available for the trade-affected worker.
- Criterion 2. The trade-affected worker would benefit from appropriate training. All boxes must be checked in order to meet this criterion.
- Criterion 3. There is a reasonable expectation of employment in the worker's commuting area (or in the area where the worker intends to relocate) upon completion of the training, based on projections of job market conditions expected to exist at the time of completion.
- Criterion 4. Training is reasonably available to the trade-affected worker.
- Criterion 5. The trade-affected worker is qualified to undertake and complete such training.
- Criterion 6. Training is suitable for the trade-affected worker and available at a reasonable cost. All boxes must be checked in order to meet this criterion.

### **Business Services Activities:**

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.

**Job for Veterans State Grant Activities:**

In addition to all WSO Center staff working with veterans, the Oregon Employment Department operates three specialized programs throughout Oregon to assist veterans, eligible persons, and businesses to connect with one another using the Jobs for Veterans' State Grant (JVSG). The JVSG funding supports Disabled Veterans' Outreach Program Specialist (DVOP), Local Veterans' Employment Representatives (LVER), and Consolidated DVOP/LVER. These staff are assigned to State WSO centers throughout Oregon and are fully integrated into and functionally aligned with WSO center services. They utilize the other WSO centers to provide JVSG program services in all 36 counties.

*Disabled Veterans' Outreach Program Specialist (DVOP) -*

DVOP specialists are professionally trained to provide exclusive services to meet the employment and training needs of special-disabled veterans, eligible veterans and eligible persons that have significant barriers to employment (SBE), and other populations in accordance with priorities determined by the US Department of Labor-VETS. DVOP specialists conduct relationship building outreach efforts to service providers in their local area to increase program awareness and to elicit WSO participation among those with the greatest barriers to employment. DVOP specialists provide customized one-on-one employment services using a case management framework; conduct comprehensive assessments and document SBE; create Individual Employment Plans (IEP's) that identify a career field, short-term goals with action items to achieve career objective and to overcome the SBE; conduct ongoing assessments during consistent contacts, both pre- and post-placement into employment; write case notes, and document case management exit outcomes. DVOPs connect their case managed customers that are work ready with the WSO Business Services staff and Local Veterans' Employment Representative staff to facilitate job placement. WSO center staff performs eligibility assessments during the initial or subsequent conversations with job seekers to determine which job seekers qualify for DVOP employment services. The WSO center staff refer DVOP eligible job seekers to the DVOP or Consolidated DVOP/LVER.

*Local Veterans' Employment Representatives (LVER) -*

Professionally trained LVERs conduct outreach to the business community and engage in advocacy efforts with hiring executives to increase employment opportunities for veterans and to encourage the hiring of disabled veterans. The State's Business Services delivery model divides the state into nine separate Workforce Regions. The LVER functions as a member of several Regional Business Services Teams located in WSO centers across their respective regions. LVERs primary focus is to conduct outreach to employers, including federal contractors and labor unions. Business Services staff provide employer follow-up leads to the LVER. Likewise, the LVER will provide employer leads to Business Services staff for recruitment assistance or for assistance with special programs such as the Work Opportunity Tax Credit,

Federal Bonding, Workshare, etc. LVER staff collaborate with Business Services on targeted veterans' events, employer visits, business presentations, and community meetings. LVER staff provide program continuity by acting as the subject matter expert on veteran recruitment, retention, hiring, and other USDOL programs like the HIRE Vets Medallion Program (HVMP). LVERs provide support to other USDOL Programs, such as Homeless Veterans' Reintegration Programs (HVRP), to facilitate job placements. In addition, LVERs work with all WSO center staff to identify and build capacity to increase employment and training resources for veteran employment.

*Consolidated DVOP/LVER -*

Oregon has Consolidated DVOP/LVER staff, as approved by DOL-VETS, in accordance with Title 38 USC, § 4102a subsection (h) that allows for a JVSG staff person to perform DVOP and LVER roles to serve DVOP eligible persons, with a particular emphasis on disabled veterans, and rural business. The Consolidated DVOP/LVER positions provide more efficient administration of DVOP duties and LVER duties in rural Oregon.

**Priority Activities - Industry Sector and Industry Consortia 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. WSO strategies will focus on the supply-side elements of a sector strategy, utilizing sector-based career pathways and training programs to prepare and connect qualified job seekers and workers to high-demand sector-based occupations and careers.

In addition to industry sector strategies, three industry consortia in manufacturing, healthcare, and technology were established through Future Ready Oregon. Future Ready is a \$200 million package of investments in existing successful programs, and in innovative equity-focused solutions to bolster recruitment, retention, and career advancement opportunities for priority populations. Each consortium is intended to be a go-to forum for sustainable, proactive, inclusive, and forward-looking industry growth strategies for Oregon's economy and workers. All three were stood-up in 2023 and are in different stages working toward:

- A Clear, Succinct Statement of Their Value Proposition;
- Members that Deliver and Respond to Aggregated Input at Scale;
- A Credible Convener Backed by Shared Leadership and Integrated Staffing;
- Working Groups with Task-Focused Structure;
- A Robust State-Regional Interface and Feedback Loop;
- A Shared Framework for Measuring Impact; and
- Informing Grant Funding Recommendations.

**Priority Activities - Work-Based Learning:**

WIOA aims to create job-driven centers that focus on work-based learning, industry-recognized/postsecondary credentials, Integrated Education and Training, career pathways, and enhanced connections to registered apprenticeship. Career Connected learning, including 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, is important to both improve learning outcomes and to help individuals with career exploration. Career Connected Learning in Oregon is a framework of career awareness, exploration, preparation, and training that is both learner-relevant and directly linked to professional and industry-based expectations. 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.

Work-Based Learning (WBL) is a priority in Oregon's 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 is anticipated in the future. Within the broad category of WBL, pre-apprenticeship and registered apprenticeships are a key priority. Key strategies to increase WBL are supported by community colleges and include cooperative work experience as part of CTE programs, internships, practicums, and health care clinicals.

**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. On average, roughly 600,000 people in over 300,000 households are served annually 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 WSO, 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.

### **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](http://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 2023. The WTDB’s [2023-2024 Strategic Plan](#) is focused by continuing the one-page format. The one-page format also provides for greater transparency and accountability. Its two-year time frame is much more nimble providing greater opportunity to respond to changes in the economy and workforce. 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 four imperatives (goals) included in the plan and committees, task forces, and workgroups focused on priority issues.

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 WSO 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, including K-12.

Strong and expanding partnerships and increasing alignment are driven by Oregon's and the WTDB's priority for continuous improvement (WTDB Continuous Improvement Committee) 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 third 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, more significant investment is Future Ready Oregon, a comprehensive \$200 million investment package that supports the education and training needs of Oregonians, and includes funding for workforce readiness, postsecondary career pathway training, credit for prior learning, youth workforce development, workforce benefits navigators, and apprenticeship expansion. The WTDB Equitable Prosperity Taskforce's Equitable Prosperity for All Whitepaper (Coraggio Group, June 2021) laid important groundwork for Future Ready Oregon. Funded with a mix of state, general fund, and American Rescue Plan Act funds, this package includes strategic and targeted investments focused on advancing opportunities for historically underserved communities. Future Ready Oregon was developed by Governor Brown's Racial Justice Council's (RJC) Workforce Workgroup that included many key WTDB members. The package was passed by the Oregon Legislature in the 2022 Legislature Session, and signed into law April 2022, by Oregon Governor Kate Brown.

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.

As described in the Oregon's Workforce Development Activities section, one-stop partners across all workforce areas developed and recently updated the WSO Operational Standards for all WSO centers and that apply to all WSO 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 high-quality services to individuals and businesses, resulting in job attainment, retention, and advancement. It is through strong components of Oregon's workforce system that Oregon can strive to reach our vision of communities where the employment needs of job seekers and businesses are met by solutions delivered effectively through engaged workforce system partners. Another key strength of the WSO system is 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.

An additional strength is the state's SNAP Employment and Training (SNAP E&T) program in WSO centers. This program is 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 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 Program Year 2022, OED's SNAP E&T program served 7,291 SNAP customers.

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 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 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 Joint Priorities, 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 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 in further alignment, continuous communication, mutually reinforcing activities, and shared measurement of outcomes, and work toward cross-agency funding opportunities. Finally, the CTE State Plan has a strong focus on career connected learning—a framework of career awareness, exploration, preparation, and training that is both learner-relevant and directly linked to professional and industry-based expectations.

Business services are continually evolving and improving. At the start of 2013, WSO 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 WSO 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 helps 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 to align business services within each region to create efficiency, leverage employer contacts, and enhance the connection between WSO business services and Local Board's sector partnerships and statewide industry consortia. This model, currently operating in all nine workforce regions, 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, WSO directly placed 1,159 workers into enhanced job listings in Program Year 2022. Using a very conservative net savings to the employer of \$10,816 per hire, the service saved Oregon businesses an estimated \$12.5 million 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 thoughts and 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. Leaning in to the description of a high-performing state workforce board Included in [Building a High-Performing State Workforce Board: A Framework and Strategies for States](#) may help create change.

The WTDB's Continuous Improvement Committee [Governance Assessment](#) (December 2022) found that WorkSource Oregon is not well defined or understood by stakeholders and customers, contributing to a lack of accountability and ability to effectively focus on continuous improvement. Additionally, the consultant found that the complexity of the workforce system - government levels, state vs local service delivery responsibilities, and a multitude of funding and reporting relationships - presents a challenge for navigation, alignment, and cohesiveness. A concerted effort is required to ensure partners and customers know about and understand the public workforce system to truly make both job seekers and employers aware of the multitude of resources available to them. This aligned and concerted effort is also needed to improve system direction, transparency, accountability, coordination, and, most importantly, outcomes.

Further, the Governance Assessment found that the various entities that make up WorkSource Oregon can be siloed in their approach and have missed some opportunities for integration of service delivery. This presents an obstacle for gathering data to indicate if the system is serving those most in need mentioned previously. Because of its lack of structural alignment - most notably WIOA Titles spread across multiple state agencies - WorkSource Oregon sometimes operates as a series of programs vs. a unified system. While the decentralized nature of WorkSource Oregon allows for individual service delivery organizations to meet the specific needs of their customers, oversight of the system, understanding system-wide impacts, and spreading/scaling improvements can be a challenge. Similarly, due to the multiple touchpoints in

the system for a customer based on WIOA's various Titles, funding agencies, and delivery organizations, it is difficult to understand the impact and tailor services that would best support a customer's need.

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, threatening to strain 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 strategy, policy, and resources with K-12 and postsecondary education and economic development. The board also provides strategic, investment recommendations on workforce and talent development that are driven by strong representation of leaders from key sectors from Oregon's business community. The board promotes a proactive, flexible, and innovative talent development system that embraces continuous improvement and accountability 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 \(LWDBs\)](#) 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. As neutral independent brokers of workforce services, they expand private-public partnerships within an integrated workforce system to ensure WSO centers meet the needs of the community. 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, certify WSO centers, and conduct program oversight to ensure appropriate use, management, and investment of workforce resources.

#### **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 WSO 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 ensures 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 build 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:**

The [Senior Community Service Employment Program \(SCSEP\)](#) is a community service and work-based job training program for older adults. 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 WSO centers through Easterseals Oregon 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. Local title II adult education and literacy programs provide instructional and workforce development services such as instruction in English as a second language; Reading, writing, and math; [GED](#)® test credential preparation; High School Diploma preparation; and Workplace skills including critical thinking, digital literacy, locating and using information, and interpersonal workplace skills. Integrated Education and Training Programs are linked to locally identified workforce needs and in many locations Title II and other WIOA partners are co-located to facilitate strong partnerships between the programs.

In collaboration with the Oregon Department of Education, CCWD also oversees postsecondary career and technical education authorized under the The Strengthening Career and Technical Education for the 21st Century Act (Perkins V). In addition, CCWD also administers Community College Career Pathways programs and 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. The commission promotes WSO efforts by co-locating key OCB staff when feasible, attending LLT meetings, attending WorkSource training and providing training and consultation to WSO partners. The goal is to better integrate and participate in the overall workforce development system.

OCB provides individuals who experience vision loss with independent living/adaptive skills training, vocational counseling and an array of other supports that allow them to live independently in their homes/communities, further their education (college, stackable accreditation/certifications, etc.) and obtain, retain, or advance employment opportunities.

Individuals may access services at any OCB office and/or work with a counselor/instructor in another location including a WSO 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 through the federal Reemployment Services and Eligibility Assessment program (53,610 claimants were served in PY 2022) strengthens the integrity of Oregon's UI Trust Fund by reducing the duration of UI claims by over 1 week per claim, which has saved employers tens of millions in tax dollars.

**Oregon Employment Department Trade Adjustment Assistance:**

The Oregon Employment Department Trade Adjustment Assistance for Worker Program includes several different staffing roles; Trade Act Navigators, TAA Case Managers, TAA Petition Coordinators, TRA Adjudicators, that provide direct customer service to Trade-affected Workers.

In addition, the Central Trade Act Unit provides oversight and state level technical assistance, compliance, and oversight in the administration of the TAA program statewide. Oregon's TAA for Worker Program also works closely with our DOL/ETA Region 6 - San Francisco Office Trade Act and DUA Programs Coordinator and Performance Management and Data Reporting, Office of TAA, ETA DOL to implement DOL requested innovative best practices and pilots.

Oregon's Statewide TAA Union Career Development Consultant teamed up with one of Oregon's Trade Act Navigators to streamline the communication flow between Trade Act Navigators, Career Development Coordinators, Employers and Trade Act Dislocated Workers. All Trade Act On-the-Job Training forms and processes were updated including the creation of an Occupational Skills Assessment.

**Oregon Employment Department Job for Veterans State Grant (JVSG):**

The JVSG program, in and of itself, does not constitute the entirety of veterans' employment and training services provided by the State WSO Centers. Rather, the JVSG program is a partner within the State WSO Centers. The JVSG program is required by law to provide employment, training, and job placement services to veterans and other eligible persons. The JVSG-funded staff fill dedicated roles through the following positions: Disabled Veterans' Outreach Program Specialist (DVOP), Consolidated DVOP/LVER (CONS), and Local Veterans' Employment Representative (LVER). JVSG staff are dedicated to their primary statutory responsibilities, as outlined in 38 USC. § 4103A, and 4104 and further defined by USDOL-VETS Veterans' Program Letters (VPL).

The DVOPs focus on providing Individualized Career Services through a case management framework to veterans and eligible persons with significant barriers to employment (SBE). The LVERs coordinate with Regional Business Service Teams and members of the community to advocate on behalf of veterans to employers and to develop job opportunities specifically for veterans. The LVERs assist all America's Job Centers (AJC) staff, to network for veterans and comply with the priority of service requirements. The CONS perform both DVOP and LVER functions. In addition, JVSG staff collaborate with their local State WSO Centers and community partners to provide the additional services to include training opportunities through WIOA and other training providers for the veteran community to obtain meaningful and successful careers.

The Stand-Alone JVSG State Plan 2024-2027 meets the requirements under the Workforce Innovation and Opportunity Act (OBM Control Number 1293-0017). Additionally, USDOL-VETS provided a Veterans' Program Letter (dated October 5, 2023) outlining the JVSG State Plan submission process under WIOA. This letter provides JVSG recipients with guidance for submission of the stand-alone JVSG State Plans for Program Years (PY) 2024–2027, including the process, deadline, and instructions for certain items.

**Oregon Housing and Community Services – CSBG:**

The Community Services Block Grant (CSBG) is a federally funded block grant in the Office of Community Services, Administration for Children and Families, United States Department of Health and Human Services that provides funds to states, territories and tribes to administer to support services that alleviate the causes and conditions of poverty in under resourced communities. The Oregon Housing and Community Services (OHCS) oversees the eligible entities or Community Action Agencies (CAA) in these efforts. The eligible entities coordinate the provision of employment and training activities through statewide and local WIOA workforce development systems and is included in CSBG activities. Community Action Agencies submit a Community Action Plan or Implementation Report to the state. This document describes the agencies coordination efforts with other organizations including WIOA where applicable.

The CSBG program, administered by OHCS, awards funds to local CAAs to provide services to low-income households at or below 125% of the federal poverty level (FPL). CSBG grantees determine how funding will be used to support allowable CSBG activities, such as employment and training activities.

- (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>6</sup> and other populations.<sup>7</sup>
    - (B) Goals for meeting the skilled workforce needs of employers.
  - (3) **Performance Goals.** Using the table provided in Appendix 1, include the State's expected levels of performance relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA. (This Strategic Planning element only applies to core programs.)
  - (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, which may include evaluation findings, 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*. This vision is captured in the WTDB's [2023-2024 Strategic Plan](#). To realize this vision, the WTDB advances Oregon through education, training, jobs, and careers by empowering people and employers by:

- Leading and communicating a long-term vision for Oregon that anticipates and acts on future workforce needs.
- Partnering with workforce, education, and training entities including Local Workforce Development Boards (LWDBs).

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<sup>6</sup> 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. 3514); 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.

<sup>7</sup> Veterans, unemployed workers, and youth and any other populations identified by the State.

- 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.
- Sharing best practices and innovative solutions that are scalable statewide and across multiple regions within the entire workforce system.

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

- An inclusive workforce system that advances equitable prosperity.
- Clear understanding of and improved use and impact of the workforce system.
- Strategic and close alignment between education, economic development, and workforce development, including public and private partners.
- The WTDB is embraced by the Governor as an accountable convener, empowered facilitator, and informed advisor.

These imperatives depend on and support each other.

Equity and inclusiveness are vital themes 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. These Oregonians include priority populations and individuals with barriers to employment, consistent with WIOA, and rural Oregonians. Despite this understanding and significant, intentional effort to address equity, there is still much work to be done. This work includes expanding access to, and ensuring equity in outcomes for, workforce system resources, programs, and services.

The complexity of the workforce system defined by WIOA can sometimes be a barrier to customer access and inclusion presenting challenges for customer navigation, experience, and outcomes. [WorkSource Oregon \(WSO\)](#) has made significant progress over the years to align and coordinate resources with programs, but opportunities for system improvement remain. A recent third-party assessment of the WSO system found, among other things, that "WorkSource Oregon is not well defined or understood by stakeholders and customers, contributing to a lack of accountability and ability to effectively focus on continuous improvement." The WTDB has a broader definition of the workforce system in Oregon consistent with [Building a High-Performing State Workforce Board: A Framework and Strategies for States](#) that describes a high-performing state workforce board as one that provides leadership to the entire education and workforce system to create sustainable change. This strategy increases complexity yet drives toward and realizes improved customer outcomes.

The opportunity for improved customer outcomes requires strategic and close alignment between business, education, economic development, and workforce development partners. 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 strategies and investments such as sector partnerships, industry consortia, and others are key to realize close alignment. These public-private partnerships more effectively address the rapidly changing skill requirements in the labor market and more comprehensively address significant labor market challenges like childcare, housing, transportation, and others.

Finally, the WTDB comprises strategic and thoughtful leaders who are well-equipped to advise the Governor on the interconnection and alignment of education, training, and workforce development. The WTDB is charged with being an essential monitor of the workforce system ensuring effectiveness, efficiency, and continuous improvement. Through the WTDB's leadership, the imperatives discussed above were pointed more specifically at five priorities shared by all partners in this plan and beyond this plan. The Joint Priorities are as follows:

- Concretely improve the connection between employers and the workforce system consistent with economic development priorities.
- Concretely deepen the integration of K-12 education in the entire workforce system.
- Improve workforce system impact by investing new and existing targeted resources that support work-based learning.
- Advance equity by identifying and closing the largest gaps in participant access to education, training, and job placement services.
- Complete necessary steps to align data in the WSO System to result in shared state and local performance reports/scorecards.

These shared priorities are expected to be incorporated into the WIOA Combined State Plan and WIOA local plans, and shape budget and policy development. The WTDB will track progress and outcomes for these priorities and will update them in concert with the WTDB's Strategic Plan update on a biennial cadence.

**Performance Goals:**

Please refer to Appendix 1.

**Assessment:**

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

*Oregon's Continuous Improvement Committee (CIC) -*

Oregon's Continuous Improvement Committee (CIC) is a collaboration between the Workforce and Talent Development Board (WTDB) and Local Workforce Development Boards (LWDBs). The CIC's charge is to assess the effectiveness of Oregon's public workforce development system or [WorkSource Oregon \(WSO\)](#) by identifying and contracting with an independent, third-

party entity to conduct a biennial assessment and develop recommendations. The CIC is the result of an Oregon legislative initiative ([Senate Bill 623, 2021](#)).

In compliance with Senate Bill 623, the Continuous Improvement Committee (CIC) has overseen the production of two Assessments of the Public Workforce system. The [WSO Initial Assessment's](#) focus was to ensure the needs of individuals and businesses most impacted by COVID-19 were prioritized and effectively served by the public workforce system. The Initial Assessment was completed in December 2021 and it incorporated input from interested partners, including Community-based organizations with a focus on serving disenfranchised communities. The [WSO Governance Assessment](#) involved an in-depth analysis of WorkSource Oregon's (WSO) governance and accountability structure, with a particular focus on the resources originating from the federal Workforce Innovation and Opportunity Act (WIOA) funding from the federal Department of Labor (DOL) and closely related workforce development resources and programs delivered through WorkSource Oregon. The [Governance Assessment](#) was approved by the Workforce Talent and Development Board in December 2022.

The scope of the CIC's 2024 Assessment is not final, but it will likely focus on conducting a cost benefit and program impact analysis to identify the best strategies to integrate efforts of all WSO programs at the state and local level to maximize resources, streamline operations, improve services, and increase results. It may also include analysis intended to facilitate implementation of the CIC's 2022 Governance Assessment Near-Term and Long-Term Recommendations.

#### *Performance Measurement and WTDB Scorecard -*

The WTDB has 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.

The WTDB is also developing a workforce system Scorecard that will include priority measures related to the WTDB Strategic Plan, Joint Priorities, Future Ready Oregon initiatives, and others.

#### *Local Area Assessment -*

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 considering 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 considering 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 are moving toward full implementation of the standards by region.

To assess the overall effectiveness of the Rapid Response the state board will review the data listed below to make recommendations for continuous or quality improvements to the Rapid Response Unit:

- Data on Layoff Aversion funds, incumbent workers served, and layoff aversion services provided.

- Data on any Disasters, Business Closures, Layoff Events and TAA petitions filed, and any Rapid Response Information sessions provided.
- Data on Dislocated workers including trade affected and potential trade affected workers served and the basic and individualized career services provided at a WSO center.
- Data on CFR 618.325 Integrated service strategies and Workforce Innovation and Opportunity Act co-enrollment will be reported to the state board.

(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 in-demand industry sectors and occupations and career pathways, as required by WIOA section 101(d)(3)(B), (D). "Career pathway" is defined at WIOA section 3(7) and includes registered apprenticeship. "In-demand industry sector or occupation" is defined at WIOA section 3(23).

(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

The following are important identified strategies. Additional strategies may arise during the plan period particularly to further address Joint Priorities, especially deepening the integration of K-12 education in the entire workforce system, continuing to identify and close gaps in participant access to education, training, and job placement services, and further aligning and improving data across the WSO 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. WSO strategies will focus on the supply-side elements of a sector strategy, utilizing sector-based career pathways and training programs to prepare and connect qualified job seekers and workers to high-demand sector-based occupations and careers. Oregon prioritizes genuine and sustained engagement with businesses from the same

industry in a shared labor market region or local area that work with education, workforce development, economic development, and community partners to tackle common needs of the targeted industry.

In addition to industry sector strategies, three industry consortia in manufacturing, healthcare, and technology were established through Future Ready Oregon. Future Ready is a \$200 package of investments in existing successful programs, and in innovative equity-focused solutions to bolster recruitment, retention, and career advancement opportunities for priority populations. Each consortium is intended to be a go-to forum for sustainable, proactive, inclusive, and forward-looking industry growth strategies for Oregon's economy and workers. All three were stood-up in 2023 and are in different stages working toward:

- A Clear, Succinct Statement of Their Value Proposition;
- Members that Deliver and Respond to Aggregated Input at Scale;
- A Credible Convener Backed by Shared Leadership and Integrated Staffing;
- Working Groups with Task-Focused Structure;
- A Robust State-Regional Interface and Feedback Loop; and
- A Shared Framework for Measuring Impact.
- Informing Grant Funding Recommendations

### **Work-Based Learning:**

WIOA aims to create job-driven centers that focus on career connected learning, work-based learning, industry-recognized/postsecondary credentials, career pathways, and enhanced connections to registered apprenticeship. Career Connected learning, including 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, is important to both improve learning outcomes, including development of essential employability skills and to help individuals understand their options through career exploration. Work-Based Learning (WBL) is a priority in Oregon's 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 is anticipated in the future.

Career Connected Learning in Oregon is a framework of career awareness, exploration, preparation, and training that is both learner-relevant and directly linked to professional and industry-based expectations. 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 each career field. Within the broad category of WBL, pre-apprenticeship and registered apprenticeships are a key priority. Key strategies to increase WBL are supported by local workforce development boards and community colleges, and include on-the-job training, pre-apprenticeships, registered apprenticeships, cooperative work experience as part of CTE programs, internships, practicums, and health care clinicals. WBL is focused on sustained interaction with business and industry, skill-attainment verification, and,

when appropriate, earning of academic credit, and. In addition, Integrated Education and Training (IET) models within Oregon's Title II Adult Basic Skills programs contain a variety of career preparation and WBL components and are designed to help Oregonians transition to employment.

A key component of the Registered Apprenticeship is structured WBL. In Oregon, registered apprenticeship historically has been almost exclusively focused in construction and, to a lesser degree, industrial manufacturing or utilities. That is changing. In recent years, Oregon created new registered apprenticeships in health, education, and informational technology occupations. Oregon plans to continue the expansion of the registered apprenticeship model in these areas and others. 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. A recent collaborative success-story is the first ever youth registered apprenticeship in the Hillsboro School District.

### **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. Career Pathways stackable certificates are developed in collaboration with employer representatives and are approved at the state level based on local labor market information and other criteria. Career Pathways are often aligned and embedded within career and technical education programs. The other key component to Oregon career pathways programs is intentional case management and support services to support retention and completion.

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, through the Integrated Education and Training model, 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.

### **Federal Investments:**

The passage of the Infrastructure Investment and Jobs Act (IIJA), CHIPS and Science Act (CHIPS), and Inflation Reduction Act (IRA) has provided all states with significant new funding to drive economic growth. The economic impact of these new programs relies on states having the workforce needed to implement them. Many Oregon agencies and organizations are working side-by-side to maximize the new investments.

The Oregon Department of Transportation (ODOT) has allocated significant IIJA funding toward workforce initiatives providing:

- Preparation of apprenticeship seekers through pre-apprenticeship programs, pre-employment counseling, orientations on the highway construction industry, basic skills improvement classes, career counseling, remedial training, entry requirements for training programs, supportive services and assistance with transportation, child care and other special needs, and job site mentoring and retention services.
- A Workforce Needs Assessment of ODOT Vendors. This assessment will identify ODOT's top contractors by award amounts and number of contracts/subcontracts, then survey them about their workforce needs now and over the next six years.
- Mentorship and Case Management for Returning Citizens including post-release support and mentorship for Returning Citizens (second chance citizens) starting and maintaining a highway construction apprenticeship.
- Child Care and other Special Needs would include more focused support for apprentices who are single parents of up to \$50,000 per year for childcare.
- Enhanced mentoring by those with journey worker history and targeted case management and wraparound services.
- Priority populations outreach into highway construction trades through the Highway Construction Workforce Partnership, including WorkSource and STEM programs.
- Developing work-based models for workforce development programs, working closely with the Governor's Office, BOLI, HECC, and other partners, such as Oregon

Tradeswomen, as part of the Oregon team for this effort and in steering our workforce needs not just for ODOT but other state agencies as well.

The Oregon Department of Energy (ODOE) will be looking to enhance and expand efforts already underway with new federal investments:

- Application for federal Solar for All (U.S. Environmental Protection Agency) grant funds working in partnership with the Energy Trust of Oregon and Bonneville Environmental Foundation. These grants will be awarded through a competitive process and may provide Oregon low-income and disadvantaged communities significant residential solar investments enabling millions of low-income households to access affordable, resilient, and clean solar energy. The grant application includes training, career awareness, and supportive services for the workforce with priorities for women- and minority-owned businesses.
- Considering the influx of federal and state investments, work more closely with environmental justice and labor stakeholders toward the U.S. Department of Energy Training for Residential Energy Contractors grant program (TREC) opportunity providing training for residential energy efficiency contractors and energy auditors, as well as other future workforce-focused grant applications.
- In addition to federal investments, the Oregon legislature approved \$2 million for workforce initiatives in 2023.

Oregon's engagement with the CHIPS and Science Act (CHIPS) has been significant. The importance of semiconductor manufacturing to Oregon's economy cannot be overstated. The Oregon legislature recently approved \$190 million to help leverage the federal CHIPS funding (Senate Bill 4, 2023) by providing direct funding for eligible semiconductor related projects. An additional \$50 million will be allocated in the 2024 legislative session. Several project priorities are focused on workforce including projects that:

- Attract manufacturing jobs to Oregon;
- Reflect established relationship, or commitment to build a relationship, with organizations focused on developing a diverse workforce pipeline;
- Form partnerships for the purpose of workforce development or the creation of training, registered apprenticeship, or internship opportunities; and
- Diversify and expand workforce pipelines.

In addition, one of the methods of demonstrating return on investment is that the recipient business must commit to the creation of new jobs in Oregon where at least 65 percent of the jobs are permanent, full-time positions and that the jobs pay on average at least the average median income for the region of this state in which the services will be performed. CHIPS funds, if awarded, will bolster these priorities and outcomes resulting in 6,300 projected new jobs.

Finally, the semiconductor initiatives recognize the following challenges:

- The need for construction workers is significant. We are working with the Oregon companies and the trades to meet the demand. Ability to complete the project is a factor in application review.
- Job creation as part of these projects will require an intentional effort to increase the semiconductor workforce pipeline.
- Childcare struggles are expected to be further strained connected to both semiconductor and construction workforce needs.

These challenges anticipate and expect significant public and private collaboration.

The examples above represent some, but not all, activity related to federal Infrastructure Investment and Jobs Act (IIJA), CHIPS and Science Act (CHIPS), and Inflation Reduction Act (IRA) in Oregon. The Governor's Office, state agencies, and relevant organizations will continue to partner together to align programs and leverage resources for these unique federal investments.

**Integrated Service Delivery:**

Oregon's continues to make progress on its Integrated Service Delivery strategy, with the goal of creating an environment for WorkSource staff to perform as an integrated system of partners that share common goals with services delivered for a seamless customer experience to address the training and employment needs of our common customers - job seekers and businesses. Integrated Service delivery utilizes co-enrollment as a tool to reduce duplicative and administrative activities in favor of a positive customer experience. Co-enrollment is the process of determining eligibility for, and enrollment into, two or more WorkSource programs. Co-enrollment is designed for staff from multiple programs such as WIOA Title I Youth, Adults and Dislocated Workers, Trade Adjustment Assistance for Workers, Migrant and Seasonal Farmworkers, Veterans, and WIOA Title III Employment Services to serve customers seamlessly, improving the customer experience and outcomes. When implemented effectively, co-enrollment is a strategy for staff funded by these programs to share responsibilities for serving customers and work in partnership so that more Oregon employers are provided workers with the skills they request, and more Oregonians are getting jobs, keeping jobs, and getting better wages.

**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 that will make it easier for state agencies,

local boards, and other workforce organizations to work together and better understand each other's services.

Agency and program leaders 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 [2023-2024 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. It is the WTDB's intent to ensure that state agencies, education and training partners, and local boards continue to proactively engage with and 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 ensure continuous improvement by creating the WTDB Continuous Improvement Committee (CIC). This collaboration between the Workforce and Talent Development Board (WTDB) and Local Workforce Development Boards (LWDBs) will assess the effectiveness of [WorkSource Oregon \(WSO\)](#) by identifying and contracting with an independent, third-party entity to conduct a biennial assessment and develop recommendations. These assessments will significantly contribute both directly, through the focus of each assessment, and indirectly, through related and connected projects and initiatives, to improved workforce strategy and alignment.

## **OPERATIONAL ELEMENTS**

### **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) consists of 49 members including all required members, the Governor's Economic Development and Workforce Policy Advisor, legislative members from the Oregon Senate and House, and other key partners and perspectives (including ex officio members). The full WTDB meets quarterly in public meetings where action items and recommendations are brought directly to the full WTDB or carried forward to the WTDB from its Committees. Committee Chairs are selected by the Chair of the WTDB. Currently, the WTDB's Committees are:

- Executive Committee
- Continuous Improvement Committee
- Workforce Readiness Committee
- Budget Committee
- WTDB Policy Workgroup

The WTDB Executive Committee consists of 15 members representing all the WIOA-required membership categories and including key board leadership. The Executive Committee meets monthly in public meetings except in months where there is a full WTDB meeting. This Committee leads and guides the work and makes recommendations to the full WTDB on key strategy, planning, and policy related to workforce development challenges, solutions, innovations, and opportunities. The Executive Committee can sometimes be empowered by the full WTDB to act on specific issues in between full WTDB meetings or in the case of an urgent matter or emergency.

The Continuous Improvement Committee (CIC) was established through state legislation and operates within an approved Charter. The CIC meets monthly in public meetings. Its total membership of 17 is equally split between state-level and local-level representatives with the addition of one representative from one of Oregon's federally recognized Tribes. It has Co-Chairs and is co-staffed with a Local Workforce Board Director and the WTDB Director. The CIC's primary responsibility is the management and oversight of the comprehensive

assessment conducted every two years but can serve as the coordinating entity for all evaluative materials related to programs delivered through the WSO system.

The Workforce Readiness Committee (WRC) has 20 members. The WRC meets monthly in public meetings. It operates within an approved Charter, has Co-chairs representing business, and includes significant membership representing K-12 and postsecondary education, business and CTE. The focus of the WRC is broad and includes research, projects, and initiatives supporting essential employability skills training and career readiness, career-connected learning and career technical education, badges and credentials, and others.

The Budget Committee is new in 2024. It will operate within an approved Charter. It has seven members and will be charged with reviewing and making recommendations regarding the fiscal matters of the WTDB, the funds received by the Higher Education Coordinating Commission's Office of Workforce Investments including WIOA Title I and state workforce funds, financial risk assessment, reporting, and supporting other WTDB Committees.

The WTDB Policy Workgroup (WG) is not a Committee of the full WTDB but it will operate in a similar fashion except that it is not required to hold public meetings. The WTDB Policy WG will address workforce system policy development and revision that impacts more than one partner in WorkSource Oregon (and potentially beyond WSO if appropriate), and/or governance policy areas called out in WIOA.

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

In response to COVID, WSO centers temporarily closed to in-person traffic for almost 12 months starting in mid-2020. During this period, the state began to phase in a number of system enhancements to support the delivery of services in a virtual format. Enhancements included new video conferencing software for use with external customers; a new WSO website, available in multiple languages, that greatly improves customer access to the menu of reemployment and training services; and an online scheduling tool, available in both English and Spanish, that allows job seekers to arrange virtual appointments with staff, or reserve computer time in a center.

The scheduling tool, launched in September 2020, has been popular with customers and helped streamline center workflow for staff. In calendar year 2023, almost 43,000 customers scheduled an appointment and connected with staff virtually or in-person for workforce services.

To further enhance the scheduling tool's utility in serving Oregon's diverse customer base, an updated version in ten additional languages (identified thru census data and customer use of other translation services) was launched in 2022. The state is also exploring options to integrate the tool with state email and calendaring systems as part of its modernization efforts to further enhance its utility in managing center workflow and communicating with customers.

The Reemployment Services and Eligibility Assessment program was an early adopter of the scheduling tool, encouraging claimants selected for the program to schedule their RESEA orientation with staff online. In addition, other workforce programs are exploring how the tool can be used to work more seamlessly together to connect customers with reemployment services. For example, the state's Unemployment Insurance division is exploring how the tool can be used to connect claimants seeking reemployment services with WSO center staff, rather than just providing them contact information.

WSO leadership remains committed to offering services through a virtual format to expand service delivery to more and diverse communities including underserved populations.

#### **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 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.

**Rapid Response:**

Oregon provides a statewide Rapid Response system, a strategy and solution for business and for a specific population, those in which individuals have lost their jobs through no fault of their own from a disaster, business closure or layoff and for those included on a TAA petition or certification.

Oregon's system includes activities that occur across the business lifecycle and a dislocated workers timeline such as: Layoff Aversion - preventing or minimizing a business closure or layoff; Rapid Response Information Sessions in which reemployment information is provided to the dislocated workers; and WorkSource Programs and Services which provides dislocated workers the services they need to become reemployed as soon as possible as well as applicable program enrollment and co-enrollment.

Rapid Response activities ensure that preventing a layoff is our first priority in which solutions are delivered to address the needs of businesses in transition, provided across the business lifecycle, including comprehensive business engagement and layoff aversion strategies and activities designed to prevent or minimize the duration of unemployment. Data on Layoff Aversion funds, incumbent workers served, and layoff aversion services provided will be reported to the state board.

Rapid Response activities ensure statewide that Rapid Response Information Sessions are provided as the second priority of the statewide Rapid Response activities and incorporates a locally integrated effort among workforce system programs and services to ensure that workers being laid off, trade-affected workers, and potential trade-affected workers are provided the information they need, and to ensure the information is current and correct. Data on any Disasters, Business Closures, Layoff Events and TAA petitions filed, and any Rapid Response Information sessions provided will be reported to the state board.

Rapid Response activities ensure that workers being laid off, trade-affected workers, and potential trade-affected workers are engaged at a WorkSource center with WIOA basic and individualized career services as well program enrollment and co-enrollment to maximize the resources available to dislocated workers. Data on dislocated workers including trade affected

and potential trade affected workers served and the basic and individualized career services provided at a WSO center will be reported to the state board. Data on CFR 618.325 Integrated service strategies and Workforce Innovation and Opportunity Act co-enrollment will be reported to the state board.

### **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 Operational 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. The Operational Standards were updated in 2023 to reflect operational changes to service delivery, such as providing virtual services to customers as an alternative way to engage with staff and access services without having to visit a center in person. This includes the option for customers to schedule a virtual appointment online through the WorkSource Oregon website. The Operational Standards are reviewed and revised as needed.

### **Trade Adjustment Assistance (TAA) for Workers Program:**

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

The TAA for workers program is part of an integrated service strategy with the Workforce Innovation and Opportunity Act co-enrollment. Oregon's integrated service state strategy makes co-enrollment available to dislocated workers which are also potential trade affected workers or trade-affected workers who are eligible for other one-stop partner programs to ensure that all necessary and appropriate services, including supportive services, are available to the worker. Oregon's state strategy is to co-enroll trade-affected workers who are eligible for WIOA's dislocated worker program.

The TAA for workers program is an active and engaged partner to core programs and WSO centers. Trade Act Navigators (TANs) work with local workforce areas to support an integrated service strategy and Rapid Response, two essential state strategies supporting re-employment services to potential trade affected and trade-affected workers.

Early intervention is critical to effectively serve dislocated workers and by co-enrolling potential trade-affected workers and trade affected workers in the DW program helps ensure expedited employment services, including training assessments. Case management and early intervention services increase customer service and lead to more positive outcomes.

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

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

The TAA for workers 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 trade affected workers should lead to employment in a high demand occupation, supported by labor market information, assessments, and meeting required criteria for training approval.

A new TAA for Workers program On-the-Job-Training braided funding strategy will continue to be expanded, including local partnerships and collaborations to fund "to work" activities for the common customer. The use of braided funding strategies is essential to making partnerships work for the common customer and leaves no employer need unfulfilled. All outreach, recruitment, referrals, intake, assessment, case management, business services, job development and program service delivery will be offered seamlessly - transparent only to co-located partners, procured service providers, referring agencies and community resource partners. The strategy plays a critical role in the workforce system to carry out sector strategies and these strategies can serve as a critical foundation for regional workforce systems.

The Oregon TAA for Workers program integrates Trade Readjustment Allowance (TRA) staff under TAA Program leadership. DOL considers this model a best practice and it's being implemented in multiple states. The TAA Program is the overarching umbrella that covers several benefits that include TRA. It is up to the TAA side of the program to ensure that both TAA & TRA benefits are administered correctly. Implementing the optimized TAA-TRA business model increases operational efficiency and customer access to eligible TAA and TRA benefits.

Trade Readjustment Allowance (TRA) is a benefit of the Trade Act. TRA benefits include extended UI benefits in the following categories; Basic TRA, Additional TRA, and Completion TRA, which may be payable to eligible claimants when they exhaust regular Unemployment Insurance (UI) benefit weeks in which the worker is either enrolled in, or participating in, or has completed approved training, or has received a waiver of the training requirement.

Reemployment Trade Adjustment Assistance (RTAA) is a wage subsidy program for Trade-affected workers 50 years or older who are not interested in re-training.

**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, Career and Technical Education (CTE) and Career Pathways Programs. 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 to improving access to, and completion of, post-secondary credentials. This will require collaboration with local partners including CTE, Career Pathways, SNAP Training and Employment Program (STEP), and other student services and supports. 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 Integrated Education and Training (IET), Vocational English as a Second Language (VESL), Oregon Adult College and Career Readiness Standards (OACCRS), and the Oregon Adult English Language Proficiency Standards (OAELPS), as well as other programs developed in response to local needs. Local Title II providers will be encouraged to explore bridge programs, leverage resources, engage partners, and blend funding to support 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 Agriculture Improvement Act of 2018 provides guidance for the national SNAP Employment and Training (E&T) program. This legislation supports work as the pathway to self-sufficiency, well-being and economic mobility for individuals and families receiving supplemental nutrition assistance. It also encourages state and local innovations in training, case management, and program design. The United States Department of Agriculture administers the national program and sends funds to the Oregon Department of Human Services (ODHS). In Oregon, the voluntary SNAP E&T program is called STEP (SNAP Training & Employment Program).

The SNAP Training and Employment program provides Oregonians 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.

In a new partnership with the Rogue Workforce Partnership, the STEP program provides STEP participants with six virtual workshops, vetted by the business community, developed specifically to develop soft skills for the workplace. These workshops, called “The Launchpad Series,” were attended by 366 STEP participants in Program Years 2021 and 2022 and provided them with soft skills they need to be successful on the job that blend with the hard skills they earned through job training. Completion of the six-coursework results in a certificate of achievement that summarizes the skills learned that are described during the job interview and observed on the job. Modules include, “Working with Respect,” “Solution Focused Thinking,” and “Building Your Professional Identity.” In her document titled, “Diversity, Equity, and Inclusion Action Plan,” Governor Tina Kotek directed state agencies to focus on underserved populations and to direct resources to “minimize the negative, disproportionate outcomes experienced by communities of color.”

To raise awareness of the Governor’s effort, the STEP program created a report to inform managers of the number of STEP participants the program served each month who were within these populations. In Program Years 2021 and 2022, Oregon served 11,367 individuals who belonged to one of more of the following historically and currently underserved population groups: African American, American Indian, or Alaskan Native, Asian, Disabled, Female, Homeless, Hispanic, Migrant or Seasonal Farmworker, Native Hawaiian or Pacific Islander, Single Parent Household.

Several years ago, OED expanded the program statewide and today 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. Today the SNAP E&T program plays a pivotal role in Oregon’s workforce system for serving low-income and underserved communities, assisting them with reemployment, training, and support services to help them achieve career goals.

#### **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/OCB staff and services as appropriate. VR and OCB will continue to have conversations about increasing co-location opportunities around the state. VR and OCB continue to be available to provide technical assistance and training to Workforce partners related to working with persons who experience disabilities.

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 allows VR and OCB to assist in the development of programmatic and individualized services to effectively provide employment for individuals with disabilities. Services through VR and OCB are individualized and consumer driven. If there is the possibility of utilizing other funded activities, VR and OCB are required to pursue any and all “comparable benefits”.

VR and OCB use the same methodologies in assessing/providing services to clients: initial assessment is conducted, disability related barriers are identified, accommodations are identified and provided, and a career or vocational objective is identified based upon interests, abilities, Labor Market Information, and any other factors influencing the choice of vocational objective.

Employment services consist of:

- Individualized job placement activities.
- Coordination with other entities/services based on the needs of the client and the barriers 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 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 the services they need without duplication.

VR and 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 continue to work with federal contractors to help meet their Section 503 requirements and targets.

VR and OCB will continue to 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 to employment. We will continue to listen to the business needs of the in-demand 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 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 partner with the educational systems to provide meaningful opportunities for growth and work experiences. 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, monitoring program compliance, 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 and supports postsecondary CTE in collaboration with

the Oregon Department of 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.

### **Oregon Housing and Community Services – CSBG:**

The Community Services Block Grant (CSBG) is a federally funded block grant in the Office of Community Services, Administration for Children and Families, United States Department of Health and Human Services that provides funds to states, territories and tribes to administer to support services that alleviate the causes and conditions of poverty in under resourced communities. The Oregon Housing and Community Services (OHCS) oversees the eligible entities or Community Action Agencies (CAA) in these efforts. The eligible entities coordinate the provision of employment and training activities through statewide and local WIOA workforce development systems and is included in CSBG activities. Community Action Agencies submit a Community Action Plan or Implementation Report to the state. This document describes the agencies coordination efforts with other organizations including WIOA where applicable.

The CSBG program, administered by OHCS, awards funds to local CAAs to provide services to low-income households at or below 125% of the federal poverty level (FPL). CSBG grantees determine how funding will be used to support allowable CSBG activities, such as employment and training activities.

### 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 the best approach(es) 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 leaders from:

- Oregon Employment Department (W–P/Title III, UI, MSFW, Vets, LMI, TAA for Workers)
- Higher Education Coordinating Commission (Titles I & II)
- Oregon Department of Human Services (Title IV, SNAP E&T, TANF)
- Oregon Commission for the Blind
- Local Workforce Development Boards
- Workforce and Talent Development Board
- WSET engages other partners as appropriate including Business Oregon, Department of Education, Oregon Department of Human Services 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 subgroup.

**Oregon 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. CCWD administers funds every to each of the 17 community colleges to create, develop, and sustain pathways for learners into high-quality CTE programs and career opportunities. Community College Career Pathways is an evidence-based model that improves student outcomes and closes equity gaps through high-quality training and wraparound support services that help students succeed.

Integrated Education and Training (IET) models and Vocational English as a Second Language (VESL) are 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 along with student support services. IET and VESL programs courses include contextualized basic skill development, workforce preparation, and workforce training. These programs accelerate time to completion and increase certificate and degree attainment for low–skilled workers and Adult Basic Skills students.

- (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.

#### Alignment with Activities outside the Plan

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 and leverages a third 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.

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, Higher Education Coordinating Commission, 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, Higher Education Coordinating Commission, and Oregon Department of Education employ apprenticeship program liaisons that work with the Oregon Community College Apprenticeship Consortium, a group comprised of 14 of 17 of Oregon's community colleges that provide three statewide apprenticeship degrees in the building, construction, and

industrial trades. 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.

### **The Bureau of Labor and Industry, Apprenticeship and Training Division:**

#### *Integrated Services -*

The Bureau of Labor and Industries (BOLI), who houses the Apprenticeship and Training Division (ATD), is the designated agency to ensure development and compliance of the registered apprenticeship system in Oregon. Oregon's Bureau of Labor and Industries is the recognized [State Apprenticeship Agency](#) (SAA) under the Department of Labor's Office of Apprenticeship, committed to fostering high-quality apprenticeship programs. As an SAA state, BOLI-ATD plays a crucial role in promoting, developing and regulating the Registered Apprenticeship System (e.g., progressive wages, on-the-job training, classroom training, mentorship, nationally recognized credentials) to ensure a skilled and competitive workforce; ATD staff are the state's leading Subject Matter Experts in registered apprenticeship. State agencies who wish to develop Registered Apprenticeship Programs (RAPs) must seek ATD involvement to provide direct oversight, required by the Office of Apprenticeship. For best practices, workforce development initiatives and funding associated with registered apprenticeship, as outlined by Department of Labor, includes alignment and partnership with the SAA during all planning stages and activities related to registered apprenticeship expansion. Through funding, training, and network connectivity amongst employers, educational institutions, and local workforce boards, ATD is responsible for the maintenance of the state's SAA status and therefore responsible for the alignment of federal and state compliance in registered apprenticeship.

ATD prioritizes intentional service integration to support cross-agency partnership building. Currently, Oregon has a more than 10,000 registered apprentices, who are registered with one of 160 Sponsors, those of which administer a total of 292 registered apprenticeship occupational standards. This apprentice workforce is directly impacted by cross-agency partnerships and collaboration. To continue the advancement of a stronger workforce infrastructure, ATD will focus efforts on the revision, renewal, and creation of Inter-Agency Agreements (IAA) across state agencies. Coordination of strategic goals will help identify regional gaps and support state-wide efforts that advance a career-ready, highly skilled, and diverse workforce.

To create alignment with WorkSource Oregon and WIOA Title 1B recipients, ATD will work to increase service integration designed for registered apprenticeship at the regional workforce board level, including the advertisement of employer tax incentives, incumbent worker stipends, and apprentice supportive services. ATD will provide subject matter expertise in training and regulatory oversight for WorkSource Oregon staff and other state and local agencies who provide expansion and outreach for registered apprenticeship pathways. Training would provide comprehensive information and education related to registered apprenticeship and pre-apprenticeship systems in Oregon, as well as the eligible activities advised by the U.S.

Department of Labor (USDOL) to support expansion of high-quality registered apprenticeship programs.

*Registered Apprenticeship System - Promotion of Diversity, Equity, and Inclusion -*

Registered apprenticeship programs are known for their inclusivity and ability to provide a pathway to high-paying careers for traditionally underserved populations. Registered apprenticeship has equity at the center. By embracing this approach, BOLI actively promotes diversity, equity, and inclusion in Oregon's workforce, ensuring that all residents have access to quality training and employment opportunities. ATD offers a comprehensive approach to inclusion through affirmative action designated by The Oregon Plan ([29 CFR Part 30](#)). By supporting workforce development initiatives that address the barriers faced by marginalized communities, BOLI can contribute to a more equitable and inclusive labor market, where individuals from all backgrounds have equal opportunities to succeed. ATD addresses systematic barriers to employment by promoting pathways to living-wage jobs in the quality job sectors, through a) resource alignment, b) compliance and accountability, c) training, technical assistance & work-based learning, d) data collection and reporting, e) expansion and outreach.

a) Resource Alignment

ATD prioritizes workforce development that generates self-sufficiency. This implies the need for housing and childcare supports to supplement wages for a time until workers can achieve self-sufficiency. The use of a progressive wage scale in registered apprenticeship supports the movement of workers from lower wage to higher wage jobs. ATD's focus is to identify registered apprenticeship resources in a manner that aligns with Title 1B WIOA funding priorities and guidelines, thus ensuring resources are distributed to support registered apprenticeship sponsors, training agents and apprentices that address the needs of targeted populations, including dislocated workers and individuals with barriers to employment. ATD leads registered apprenticeship outreach efforts with employers, career and technical educators and partners, high schools, education service districts, the secondary and postsecondary education system, local workforce development boards, veterans, community-based organizations, and other outside organizations. Greater investment in outreach efforts will help to inform those unfamiliar with registered apprenticeship and will help meet our state's demand for a diverse skilled labor force.

ATD currently has one veteran's program coordinator, on staff as, who provides training and resources to partnering agencies, apprenticeship sponsors, and connects a resource for veterans wishing to pursue registered apprenticeship. Additionally, they work directly with apprenticeship sponsors to ensure they have the resources and meet requirements to allow the opportunity for veterans to use GI Bill benefits while registered in a registered apprenticeship program. Further investment in an apprentice career guide that could serve priority populations entering apprenticeships will follow this model in diversifying apprenticeship trades.

As SAAs play an important role in the administration of GI Bill® benefits. GI Bill benefits provide educational assistance payments to eligible veterans and servicemembers and their families enrolled in approved programs of education. The SAA role is intended to ensure that veterans and other GI Bill participants have access to a range of high-quality education and training programs at which to use their GI Bill benefits. In FY2017, the Department of Veterans' Affairs (VA) is estimated to distribute over \$14 billion in GI Bill benefits to over 1 million eligible participants.

Studies have found that women and minorities complete apprenticeship programs at lower rates than do white male apprentices. By providing services to current apprentices, supportive services create blanket support for rapid response activities. To proactively address Oregon's shortage of skilled trades workers, the BOLI and the Oregon Department of Transportation (ODOT) initiated a program to build public awareness of careers in the heavy highway construction trades and provide critical support to current apprentices—especially among women, minorities, and underrepresented groups. As part of an effort to build a robust statewide initiative, provisions include providing counseling and financial support for on-the-job apprentices. BOLI with their IAA with ODOT actively support the advancement of women and minorities who are in Oregon's Child subsidies reimbursement program. To continue the advancement of a stronger workforce infrastructure, through the completion of apprentices through RAPs, ATD will focus efforts on the revision, renewal, and creation of IAA across state agencies. Coordination of strategic goals will help identify regional gaps and support state-wide efforts that advance a career-ready, highly skilled, and diverse workforce.

#### b) Compliance and Accountability

ATD's primary function, is to register, facilitate, and promote apprenticeship in Oregon, which generates opportunity for priority populations to earn while they learn, leading to a high-quality, living wage career. As a SAA, ATD must adhere federal requirements that state every registered apprenticeship program must undergo an in-person, on-site compliance review every year for the first 3-year probationary period required of new programs, and after that, a single review every 3-5 years. Data collected through the compliance review allows ATD to evaluate a program's success at achieving its utilization goals, Targeted Outreach Recruitment and Retention Plan (TORRP), and completion rates, thus demonstrating a program's efficacy in recruiting and retaining priority populations. Targeted outreach and recruitment refer to activities that are likely to increase candidates for apprenticeship from any targeted group of individuals found to be underrepresented in the apprenticeship program. A key aspect of developing apprenticeship Affirmative Action Programs is conducting analyses comparing the demographic characteristics of your apprentice workforce to the demographics of the available workforce in your recruitment area.

Universal and targeted outreach includes the recruitment of all RAP sponsors who are required to conduct universal outreach and recruitment, which entails reaching out to organizations within your relevant recruitment area that can refer candidates for

apprenticeship from all demographic groups. Recruiting widely can generate referrals from all demographic groups, including qualified individuals from demographics underrepresented in apprenticeship programs, such as women, minorities, and individuals with disabilities. Sponsors required to develop Affirmative Action Programs must also conduct targeted outreach and recruitment, but only under certain circumstances, as described below. When these analyses reveal that one or more demographic groups (sex, race, or ethnicity) is underrepresented in your apprentice workforce, you must conduct targeted outreach and recruitment. Registration agency staff will work with you to set aspirational goals to include more individuals from the underrepresented group(s) in your apprentice workforce.

#### c) Training, Technical Assistance, & Work-Based Learning

Within the broad category of training, technical assistance, and work-based learning, 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 local workforce boards to ensure new apprenticeship programs are aligned with industry need and local sector strategies; (4) partner with secondary and postsecondary 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.

#### d) Data Collection and Reporting

ATD directly supports the growth the development of Registered apprenticeship through the National RAPIDS System. The Apprenticeship and Training Division will oversee and be an integral component of all Registered Apprenticeship discussions across the state of Oregon to foster partnerships in line with WIOA requirements. Establish effective communication channels to coordinate efforts and share information, including data sharing agreements.

Pursuant to ORS 657.734 there is established the Performance Reporting Information System (PRISM), BOLI ATD is currently a party to an IAA between the Oregon Employment Department for the purpose of collecting, analyzing, and sharing statistical and demographic data for the development and reporting of workforce system performance measures.

This Agreement establishes the following protocols for BOLI to provide data in a format and according to protocols established by OED system administrator, delegate one technical level staff to represent the System Participant in the PRISM Data Elements Group and provide accurate, time-appropriate data that meets the PRISM established

timelines. This establishes safeguards for protecting the confidentiality of data in PRISM, includes provisions regarding informed consent for sharing information obtained from individuals. The PRISM data sharing agreement, IAA, across state agencies, supplies necessary data from BOLI ATD to OED to collaboratively support the requirements set forth by PRISM.

e) Registered Apprenticeship Expansion and Outreach Requirements for SAA  
As a SAA State, Oregon is required uniquely qualified to support the USDOL's priority goals of expanding, modernizing, and diversifying Registered Apprenticeship, ultimately leading to good jobs, good wages, and strong career pathways. Employers face challenges in filling open positions and finding employees with the skills they need. Jobseekers, youth, students, and those in career transition face challenges in identifying career interests, connecting with job opportunities, and developing skills to improve their employability. Registered apprenticeship is a proven workforce development solution to address the challenges employers and jobseekers face in the modern labor market.

Significant federal investments have been made to grow the number of apprenticeship programs; expand apprenticeships into non-traditional industry sectors such as healthcare, information technology, and education; and increase equity in and access to apprenticeship training. States are leading these efforts, supported by grants from the U.S. Department of Labor, by implementing expansion strategies that meet workforce needs through Registered Apprenticeship Programs. ATD will continue to support expansion efforts, through IAAs, that include elements to encourage the necessary framework for implementing sustainable, scalable apprenticeship expansion initiatives. These elements of focus include state leadership and policy, outreach and business engagement, capacity to develop, register and support programs, facilitate diverse apprenticeship pipelines, and provide alignment with career pathways and postsecondary education.

*Registered Pre-Apprenticeship Training Program, CTE Alignment -*

Registered Pre-apprenticeships Training Programs (PATP) are programs designed to prepare under-represented, disadvantaged, low-skilled, or individuals from Priority Populations to enter and complete a registered apprenticeship program and has a partnership with at least one registered apprenticeship committee. There are various models for development and implementation of PATP. Some programs are designed to support one specific trade while others are designed as exploratory programs and introduce various trades. All PATPs are required to have an agreement with at least one registered apprenticeship program to facilitate program graduates either direct entry or additional points into a RAP. Career Technical Education (CTE) programs have a particular alignment with PATPs. However, as the system evolves and the opportunity for enhancing CTE programs to become Registered CTE Apprenticeship Programs an active (IAA) coordination between BOLI, HECC and ODE is required to support with uplifting of Registered CTE Apprenticeship programs as proposed by the USDOL.

In December 2023, the USDOL provided a notice of proposed rulemaking (NPRM) to revise regulations for registered apprenticeship by enhancing worker protections and equity, improving the quality of registered apprenticeship programs, revise the State governance provisions, and more clearly establishing critical pipelines to registered apprenticeship programs, such as registered career and technical education (CTE) apprenticeships. The proposed rule would improve the capacity of the National Apprenticeship System to respond to evolving employer needs, provide workers equitable pathways to good jobs, and increase the system's long-term resilience.

The new model, Registered Career & Technical Education (CTE) Apprenticeship, will formally link registered apprenticeship with education at the high-school, community college, and university levels to support the recognition and value that credit-bearing training programs have on students' progress through education and career development. Not only will this change provide pathways for diverse generations of apprentices in critical sectors, but it will also provide stronger alignment with education and workforce to create a robust National/State Apprenticeship System that supports opportunities for students and youth. Intentional coordination with ODE and CTE across the state is crucial to not only coincide with data reporting requirements outlined in WIOA, but also to clarify delineation of the duties and powers of the administration and advisory bodies. The CTE Registered Apprenticeship Model, identifies a focus on standardization and uniformity that promotes transparency and accountability, which will require state-agency cross collaboration, funding, and strategic planning for expansion, outreach, and compliance under the Office of Apprenticeship.

**Additional Apprenticeship Alignment:**

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 can prepare for future apprenticeship opportunities should the individual choose to do so.

The Oregon Department of Education (ODE), the Higher Education Coordinating Commission (HECC), Development (CCSD) and the Bureau of Labor and Industry (BOLI) conveyed a unified message regarding the expectation that all education and training programs assist learners in exploring potential career interests and acquiring the industry-specific knowledge and skills needed to take their next steps (see Figure #1 - Outline of the Common Expectations and Number of Programs in 2022-23). The State Agencies provided programs with guidance, professional development, and resources to ensure learners actively participate in direct, practical experience with the tasks and skills they will need in their chosen career. They helped programs continue to expand opportunities that allow apprentices, pre-apprentices, and CTE students to engage in hands-on learning alongside experts in the field. The State Agencies remained focused on collaborating to provide equitable access to education and workforce development opportunities that empower individuals from all backgrounds to pursue their

aspirations and contribute to their communities and align programs including embedding pre-apprenticeship programs within CTE Programs of Study within high schools.

Several regions have been able to leverage funding for pre-apprenticeship programs to expand pre-apprenticeship into more CTE programs of study providing a tighter and more diverse pathway for entry into registered apprenticeship programs.

Figure #1 - Number of Programs in 2022-23 and Common Expectations



### Oregon Unemployment Insurance:

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 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 continues to examine 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. Based on the success of a pilot conducted in 2021, the UI program will be offering Rethinking Job Search (Rethinking) program to UI claimants, tentatively scheduled to start early 2024. Rethinking uses cognitive-behavioral techniques in an intensive educational eight-week 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.

### Coordination, Alignment and Provision of Services to Individuals

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 hold 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.

TAA for Workers program 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. TAA for Workers program participates in meetings with local workforce boards and WorkSource partners to help align and leverage services to meet the needs of affected workers. TAA for Workers program is an active partner in Rapid Response (RR) activities at the local level. This provides an opportunity for TAA for Workers program to advise and educate partners on the TAA for Workers program guidelines and protocols and learn more about partner programs and services, improving planned services for trade-affected Oregonians.

Trade Adjustment Assistance Program TAA Navigator staff strive for an early Intervention approach to address the needs of potential trade-affected workers immediately from when they receive notice of a layoff through successful reemployment. The potential trade-affected workers are provided the WIOA staff coordination and alignment to enroll in WIOA Title I Dislocated Worker program to receive the services they need upon notice of a layoff, before or at the point a TAA petition is filed for the group of workers, and while a petition is under investigation. Any dislocated worker who can benefit from DW program services should be enrolled in DW while TAA petition determination is being reviewed.

At the time of the TAA petition certification If a customer has not yet been enrolled in DW program services, TAA case managers will make a referral for co-enrollment to the appropriate Title I service provider for co-enrollment into DW and any other appropriate workforce program service.

As a partner to the core programs, TAA for Workers program programs align with core programs in this plan to better serve customers.

- TAA for Workers program refers all workers by providing “warm hand-offs” to appropriate services and service providers based on assessments.
- TAA for Workers program accepts assessments completed with partner staff; likewise, TAA for Workers program provides assessment and training plan information to partners of co-enrolled participants.
- TAA for Workers program will refer customers to resources within the agency or community.
- TAA Information Session to be focused on benefits and services available to affected workers as well as the sector strategies in their area.
- TAA for Workers program 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.
- TAA for Workers program refers participants to services outside of what can be provided by Trade to help with barrier removal.

- TAA for Workers program conducts 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 learning opportunities available to customers.

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.

Oregon’s CTE State Plan includes strategies to integrate career connected learning systemically in Oregon. One of the strategies to achieve this is to align education and workforce systems to ensure equitable access to career connected learning and elevate effective resources and assets to foster seamless transitions from K-12 to postsecondary and into careers. A key component of this strategy is that there are clear transitions support for students graduating high school to ensure they are connected to a college, a career opportunity, a community organization or a WorkSource Oregon center.

- (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 to provide comprehensive, high-quality services to employers and meet their current and projected workforce needs. WorkSource Oregon stakeholders will align services to businesses using sector strategies and partnerships, 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 on key industry issues, curriculum alignment, 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 through 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 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.

The coordination and alignment of activities and resources in WorkSource Oregon (WSO) centers will involve multiple stakeholders to provide comprehensive, high-quality services to employers and meet their current and projected workforce needs. WorkSource Oregon stakeholders will align services to businesses using 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 availability of skilled and/or qualified workers, retention, expansion, and recruitment. Industry and sector partners will work with education, workforce development, economic development, and community organizations to focus workforce priorities on key industry issues and goal attainment.

WSO continues to align business services to support workforce investment activities and meet the needs of businesses and support economic growth in each area. Leveraging and aligning collective resources brings enhanced communication, coordination, and collaboration among businesses, economic development, service providers, business team members, and local workforce development boards.

The public workforce system and business services teams work in tandem to connect the diverse communities we serve, such as veterans, migrant and seasonal farmworkers, unemployment insurance claimants, and dislocated workers with employment opportunities. Labor market challenges continue, with many workers retiring and choosing not to return to work post pandemic. To address these challenges, business staff continue to engage with the communities they serve, inviting candidates into the system through outreach, special events and social media. Providing employers with staff assisted services beyond the labor exchange system and dedicating their talents, resources, networks, and connections to addressing employer needs. Additional staff assisted services include the LinkedIn Partnership.

Business staff continued to utilize the WSO's LinkedIn recruiter platform to help fill positions by sourcing candidates that are not within the labor exchange system already. This process brings new candidates into the WorkSource system and provides them with the knowledge of programs and services to address the talent gap beyond recruitment. The partnership with LinkedIn began July 2020 and to date has generated almost 20,000 followers and gained national recognition.

The business services team continued its partnerships with other special programs, such as STEP, RESEA, MSFW, Veterans and Trade Act, to ensure a pipeline exists for the referral of those customers for enhanced job matching and placement assistance. The business services team will continue to look for innovative ways to connect customers served by these special programs with job listings.

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 through which they can learn about evolving industry needs, and a vehicle to identify, build and refine curriculum, programs, and credentials.

All WSO centers are required to develop, implement, and actively manage two feedback loops aimed at aligning and improving services. Centers developed 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 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. Feedback received will be promptly followed up on by staff.

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. From a bigger picture perspective, WSO is helping with the prosperity of individuals, families, and communities at large through their proactive support of business and promotion of employment.

Business Analyst staff play a significant role in connecting employment opportunities to job seekers. This role is dependent on our efforts to build and maintain successful relationships with businesses. To build a successful relationship, Business Analysts begin by conducting on-site employer visits prior to the start of the recruitment. Conducting an onsite visit provides insight into the specific business' needs, their internal team needs and company culture, improving the quality of referrals and employment outcomes. Qualified candidates are then identified and sent in a timely manner. Business Analyst source candidates from different talent pipelines, promote the opportunities, screen candidates, and narrow the candidate pool for employers to consider top talent. This saves employers time and money in the recruitment process and adds the human element to recruiting beyond an online job board. By getting to know the business and their needs, Business Analysts are able to make quality referrals beyond minimum qualifications and set job seekers up for success when connecting them, increasing the odds of retention.

Additionally, WSO Career Development Coordinators (CDC) work with Work Ready customers to identify and pursue opportunities in coordination and collaboration with our Business Analysts, who work the Staff Assisted recruitments directly with employers and cultivate relationships with businesses. The CDCs functions as a Career Navigator for job seekers who voluntarily enter the work ready pool and desire the partnership in their career search. CDC's primary customer is the Work Ready customer, while Business Analysts primary customer is the employer. Together, along with other partners in the workforce system, both business and job seeking customers are being connected for meaningful opportunities and talent fulfillment through this collaborative model.

**Work Ready:**

The Statewide Work Ready program was created in partnership with WorkSource Oregon staff including partners and Workforce Boards. The Work Ready Program is designed to identify and promote validated job seekers directly to employers to expedite their employment. This program will help the job seeker Get Connected to valuable resources, create a job seeker profile that will Get Noticed, and help them Get Hired by local employers!

This collaboration includes economic development as a workforce partner 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.

*Recent Program Activity -*

Services to employers produced the following outcomes in Program Year 2022.

Total businesses served	7,608
Total staff assisted job listings	2,262
Self-referral job listings	131,945
Downloaded job listings from NLx	253,745
Total staff-assisted hires	1,159
Total self-referral hires	1,053
Referral to Hire Ratio	2.63
Avg. days for WSO to fill a staff-assisted job	24
Total system placements	28,417

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

Placement: *Customer is hired after receiving staff-assisted services*

Hire: *Customer is hired after being referred to a job listing by staff or after self-referring to a job listing*

In addition to strengthening partnerships for better service delivery to our common customers, Business Services continue to help in their recruitment needs to sister state agencies with the opportunity to interact with job seekers from across the nation. In 2023, Business Services ran a national LinkedIn campaign resulting in almost 1,000 job seekers attending three different occurrences of virtual open house for several state agencies offering career opportunities, connecting HR, recruiters and hiring managers with job seekers.

The business services team continues to partner with other special programs, such as SNAP Employment and Training, Reemployment Services and Eligibility Assessment, Migrant and Seasonal Farmworker, Veterans, Trade Act, and WIOA Title 1 Adult and Dislocated Worker. Additionally, the team partners with numerous organizations serving targeted demographics such as justice involved, to ensure a pipeline exists for the referral of those customers for enhanced job matching and placement assistance.

Aligning business services efforts ensures that workforce investment activities meet the needs of businesses and support economic growth in each area. Leveraging and aligning collective resources brings enhanced communication, coordination, and collaboration among businesses,

economic development, service providers, business team members, and local workforce development boards.

Incentive programs encourage companies to give opportunities to candidates who may face skill gaps or employment barriers, but otherwise have the potential to meet the employer's needs, thereby reducing structural unemployment in the community. Programs include:

- Preferred Worker Program, which provides a wage subsidy through the Department of Consumer and Business Services for workers unable to return to regular employment because of on-the-job injuries;
- Federal Work Opportunity Tax Credit, which gives a tax credit to employers who hire individuals from target groups who have significant barriers to employment;
- [Work Share](#), which provides partial UI benefits to workers experiencing reduced hours, as requested by an employer seeking to avoid a layoff; and
- Senior Community Service Employment Program (SCSEP), which is managed in some counties by Experience Works or Easter Seals and provides community services and economic self-sufficiency through training and placement in unsubsidized jobs for individuals aged 55 and older, who have low income and poor employment prospects.

The public workforce system and business services teams work in tandem to connect the diverse communities we serve, such as veterans, migrant and seasonal farmworkers, unemployment insurance claimants, justice involved and dislocated workers with employment opportunities.

The Trade Adjustment Assistance (TAA) Program expanded our Business Service Teams across the state, putting one Business Services Representative in each of our WSO centers and a Career Development Coordinator in every region. This organizational change optimizes braided funded strategies being used, especially those involving local partnerships and collaborations to fund “work” activities for the common customer. This braiding strategy will be used to produce greater strength, efficiency, and/or effectiveness of our local service delivery by enhancing our relationships to the boards, our employer base, and the customers we serve. The use of braided funding strategies is essential to making the partnership and the model work. All outreach, recruitment, referrals, intake, assessment, case management, business services, job development and program service delivery will be offered seamlessly — transparent only to co-located partners, procured service providers, referring agencies and community resource partners.

While these positions will be funded by TAA to focus on training completers and those seeking work-based learning opportunities, we will also leverage results with our other Federal Programs so that no business need goes unfilled. If there is not a qualified Trade candidate, other workforce customers will be offered the opportunity to ensure we are meeting the needs of employers. Employers are vital to our economic development; this will ensure as a system, we are supporting both business needs and Workforce Boards strategies identified by data and driven by labor market needs.

Oregon's TAA for Workers program coordinates and collaborates with business services to focus on completers and those seeking work-based learning opportunities, such as the participants completing their training plans and TAA for Workers On-The Job Training programs participants and build relationships with our other federal programs partners so that no business need goes unfilled. If there is not a qualified TAA for Workers program candidate, other workforce customers will be offered the opportunity to ensure we are meeting the needs of employers. Employers are vital to our economic development; this will ensure as a system, we are supporting both business needs and workforce development board strategies.

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 Adult Education and Family Literacy Act (AEFLA).

Adult Education and Family Literacy Act (AEFLA) 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. Furthermore, having a well-aligned workforce system offers the greatest benefit to employers. Through collaboration and co-delivery of services, employers' benefit from having a point of contact within the system who can steer them towards the appropriate resource to address their needs.

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

- (E) *Partner Engagement with Educational Institutions and other Education and Training Providers.* Describe how the State's Strategies will engage the State's community colleges, adult education providers, area career and technical education schools, providers on the State's eligible training provider list, and other education and training providers, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv). Include how the State's strategies will enable the State to leverage other Federal, State, and local investments to enhance access to workforce development programs at these institutions.

### Partner Engagement with Educational Institutions and other Education and Training Providers

#### **Postsecondary Education and Training Attainment:**

Oregon House Bill 2311 (2017), codified in Oregon Revised Statute (ORS) 350.018 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 postsecondary 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 are not currently enrolled in a high school equivalency program, an institution of higher education, or another postsecondary training program.

House Bill 2311 aligned 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 reinforced 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. Oregon's attainment goals have and will continue to provide a focal point for investment for both existing and new federal, state, and local funds. In addition, they inform the pursuit of current and future competitive public and private grants.

**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 and the ability to leverage funds to realize greater coordination.

**Oregon Talent Assessment:**

The Oregon Talent Assessments are business and industry's determination of in-demand occupations, skills, talent, gaps, and trends. The goal of these reports 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 postsecondary representatives have been and will continue to be a part of biennial Talent Summits which provide insight into the Assessments. The reports are broadly shared and discussed with postsecondary institutions and programs. The 2024 Assessment will identify two categories of critical occupations: (1) those that provide upward mobility and career progression for workers and (2) those that are necessary for Oregon's economy that may not provide high pay and/or career progression. Using this list of occupations, the 2024 Assessment will identify and describe the occupations that experience chronic worker shortages and identify the causes of these shortages. Finally, the 2024 Assessment will determine labor supply-demand gaps and investigate the barriers to hiring for occupations that exhibit chronic worker shortages and if there are opportunities for workforce training/reskilling to expand the pool of employees who can work in these occupations. This will provide significant help to target investment opportunities.

**Industry Sector Strategies:**

Postsecondary 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 to align priorities, activities and initiatives, and leverage resources. Sector partnerships make these connections at the regional level and make these partnerships successful.

**TAA and UI Strategies:**

The TAA Liaison to higher education works at the administrative level and assists with any process misalignments between education and the TAA for Workers program to improve the shared student experience and completion rates for trade-affected workers.

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.

TAA for Workers program 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.

TAA for Workers program Statewide Union Career Development Consultant attends Joint Apprenticeship Training Center Apprenticeship Coordinator quarterly meetings held on various apprenticeship-training sites to increase knowledge on application process and learn of open application timelines to share with TAA staff and participants.

TAA for Workers program 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.

The TAA for Workers program works with local community colleges to schedule joint workshops on the local community college campus to improve training enrollment for Trade-affected workers in need of adult basic skills and English Second Language skill development.

TAA for Workers program 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.

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 for them to achieve success in their short and long-term employment goals through education.

Oregon's UI and TAA for Workers 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:

- TUI when they lose their job through no fault of their own and are determined to be dislocated workers.
- 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.

**Additional 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 Education and Training (IET), Vocational English as a Second Language (VESL), Oregon Adult College and Career Readiness Standards (OACCRS), and the Oregon Adult English Language Proficiency Standards (OAELPS), as well as other programs developed in response to local needs.

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.

- (F) *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.

Community colleges offer a variety of workforce development services that are important to the overall capacity of the state workforce development efforts. These include education and training such as adult basic skills, transfer pathways, non-credit certificates, Career and Technical Education credit certificates and degrees, continuing education, Registered Apprenticeship related training, customized workforce training, Integrated Education and Training, and stackable credentials. The development and expansion of credit-bearing 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 state statute as being 12-44 sackable credit certificates with multiple on and off ramps that lead to 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.

Colleges also offer multiple pathways for learners to earn industry-recognized certificates, and licenses or certifications. Many of these credentials are earned post program completion and include pathways to licensure through the related training required for Registered Apprentices. This pathway can include multiple credentials and licenses as an apprentice earns a Journey Card for completion of the apprenticeship, industry recognized credentials for skill attainment, a

certificate or degree for completion of the related training, and a license, depending on the occupation. Other programs may support learners to earn industry recognized credentials as they progress to higher skill levels in a program. At completion, these students may have earned multiple industry-recognized credentials, a certificate or degree, and be prepared for licensure as appropriate for the occupation.

An important goal for Title II Adult Basic Skills service providers is 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 Integrated Education and Training (IET), Vocational English as a Second Language (VESL) Oregon Adult College and Career Readiness Standards (OACCRS), and the Oregon Adult English Language Proficiency Standards (OAEPLS), as well as other programs developed in response to local needs. Local Title II providers will be encouraged to explore bridge programs, leverage resources, engage partners, and blend funding to support 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.

In Oregon CTE Programs of Study are prioritized for Perkins V funding. These programs, aligned from secondary through postsecondary, provide students with an articulated pathway from K-12 through a two-year degree. Some programs also award dual credit, enabling high school students to access college credit courses while still in high school and accelerate their progress in earning a postsecondary credential or degree.

Effective training often must go beyond classroom training to address all types of learners and provide hands-on experiences. Career Connected learning, including 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, is important to both improve learning outcomes and to help individuals with career exploration. Work-Based Learning (WBL) is a priority in Oregon's 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 is anticipated in the future.

Career Connected Learning in Oregon is a framework of career awareness, exploration, preparation, and training that is both learner-relevant and directly linked to professional and industry-based expectations. 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, pre-apprenticeship and registered apprenticeships are a key priority. Key strategies to increase WBL are supported by community colleges and include cooperative work experience as part of CTE programs, internships, practicums, and health care clinicals.

Overall, Oregon will leverage existing education and training resources across all six core programs and with other departments, including the Bureau of Labor and Industries (Apprenticeship and Training Division), Department of Education, Department of Human Services, and Business Oregon (Economic Development Department), Oregon's 17 community colleges, Local Education Service Districts, K-12 school districts, and providers on the state's eligible training provider list to improve the job-driven education and training system currently in place in the state.

Required Co-Enrollment of common customers in the Title I Dislocated Worker Program and the Trade Adjustment Assistance for Workers program will improve access to activities leading to recognized postsecondary credentials including Registered Apprenticeship certificates through journeyman. Trade Act provides the training funds and case management services, and Title I provides the much-needed wrap around services that leads to the adult learners/ student retention to improve upon the student success.

(G) *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 Oregon Governor's Office has joined the workforce and economic development policy areas together. Economic development and workforce priorities have been a key part of all activity related to recent federal investments including the Infrastructure Investment and Jobs Act (IIJA), CHIPS and Science Act (CHIPS), and Inflation Reduction Act (IRA) in Oregon. The Governor's Office, state agencies, and relevant organizations will continue to partner together to align programs and leverage resources including workforce and economic development for these unique federal investments.

The WTDB provides strong emphasis on the coordination of workforce and economic development activities. Within the WTDB's [2023-2024 Strategic Plan](#) includes one of four imperatives: Strategic and close alignment between education, economic development, and workforce development, including public and private partners. In addition, The Joint Priorities for the workforce system include: Concretely improve the connection between employers and the workforce system consistent with economic development priorities. Consistent with this, the WTDB recently added a member to the WTDB from Business Oregon, the state's economic development agency.

These connections flow through to additional state-level activities through industry consortia and local-level activities through sector strategies. Each consortium is intended to be a go-to forum for sustainable, proactive, inclusive, and forward-looking industry growth strategies for Oregon's economy and workers. Sector strategies prioritize genuine and sustained engagement with businesses from the same industry in a shared labor market region or local area that work with

education, workforce development, economic development, and community partners to tackle common needs of the targeted industry.

(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—

(1) State operating systems that support coordinated implementation of State strategies (for example labor market information systems, data systems, communication systems, case management systems, job banks, etc.).

#### State Operating Systems that Support Coordinated Implementation

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

- Labor Market Information
- Career Exploration and Assessment Tools
- Operations and Management Systems (Titles I, II, III, IV, and TAA for Workers program)
- Job Banks

#### **Labor Market Information:**

The Oregon Employment Department's Communications and 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.

The division has long been a leader and innovator in labor market information, with activities and projects such as the Workforce Analyst program that has economists stationed in multiple WorkSource Centers across the state to provide local, customized labor market information to staff, employers and workforce boards for strategic planning and operational purposes.

The division operates an award-winning labor-market information website. Through QualityInfo.org, the division's many special publications and reports are available for download to include the annual Careers magazine, aimed at the career planning needs of students and

those changing occupations. Additional publications cover a variety of subjects to include employment projections, wage and benefit information, job vacancy surveys, occupations in demand by area, agricultural employment by area, and employment data for occupations that require STEM (science, technology, engineering, and math) knowledge, to name a few.

These and other publications including a vast array of economic and workforce data are available through QualityInfo.org to assist job seekers in making informed career decisions. Career information (wage data, projections, training providers, etc.) from QualityInfo.org is also integrated into the state's labor-exchange system (iMatchSkills) for career planning and coaching purposes.

### **Career Exploration and Assessment Tools:**

#### *Career Information Systems (CIS) -*

CIS is a computerized career information and guidance system designed to deliver career assessments and high-quality national and localized information about occupations, employment, education, and training to students and adults. Supported by the University of Oregon, CIS is available in one-stop centers for job seekers.

#### *ACT/WorkKeys -*

ACT WorkKeys courseware is available through one-stop centers to help job seekers determine career readiness and gauge foundational and soft skills. Test scores are used to determine aptitude for a specific career, or to demonstrate expertise to future employers. Data collected thru WorkKeys is shared with the state for program reporting purposes.

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

The state uses a common Customer Registration (CR) system as the initial point of entry for Titles I and III and Trade Act. The CR system captures customer contact information and demographics, identifies special populations, such as Veterans and Migrant Seasonal Farmworkers, and captures program eligibility components for the Wagner-Peyser, Adult and Dislocated Worker programs. It also tracks the most recent qualifying service for these programs, including Trade Adjustment Assistance. Oregon plans to use this information to calculate a common episode for federal reporting after we have established co-enrollment and common exit policies and procedures.

Information collected in customer registration is shared with downstream systems to facilitate streamlined service delivery across core programs. Specifically, information is shared with I-Trac, the local areas case management system for tracking Title I Adult and Dislocated worker program activity; iMatchSkills, the state's labor-exchange system for tracking Title III Wagner-Peyser program activity; and Trade Adjustment Assistance Management Information System, the state's case management system for tracking TAA program activity.

### *Title III Wagner-Peyser -*

iMatchSkills (iMS) is web-based system that connects job seekers and employers; all customers have 24/7 access to the system. Through iMS, 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.

iMS provides a host of features for employers as well. Through iMS, employers can set up an online account to post and manage their own job listings. In addition, employers can match their job listing, view the skills and qualifications of potential candidates, and contact those they consider to be a best fit.

In addition to tracking Wagner-Peyser program activity, iMS also functions as a case management and reporting tool for the following workforce programs: Jobs for Veterans State Grants (JVSG), Reemployment Services and Eligibility Assessment (RESEA), Migrant Seasonal Farmworker (MSFW), SNAP Training and Employment (STEP), Foreign Labor Certification, and Able Bodied Adults Without Dependents (ABAWD).

iMS is also the system of record for providing services to businesses such as job matching and customized recruitment services – work that support the state’s sector strategies. Business services staff use iMS to connect targeted populations with job opportunities, including veterans, claimants, MSFWs, STEP and ABAWD participants, and Trade Adjustment Assistance participants.

iMS is linked with numerous Employment Department systems including unemployment insurance claim records, employer tax records, historical wage data, and labor market information, providing staff with ready access to critical information for efficient and streamlined delivery of labor-exchange services in one-stop centers.

### *Title I Adult and Dislocated Worker Programs -*

I-Trac is a comprehensive management information system for tracking and reporting services provided through the Adult and Dislocated Worker programs. Through I-Trac, staff can manage grant funded activity, track services and participation in training programs, provide follow-up services, and generate reports for program management purposes. I-Trac is a third-party MIS used by all nine of Oregon’s workforce areas.

### *Title II Programs -*

Title II tracks participants using CASAS TOPSPro Enterprise. To measure postsecondary enrollment and completion, Title II data is matched with Oregon’s Community College and Workforce Development student database, D4A, using social security numbers and universal student identification numbers. In instances where social security numbers are not populated in the database, a data match is conducted using first and last names, along with date of birth. A

data match is also conducted with the Oregon Employment Department to track employment and earnings outcomes.

*Title IV Programs – Vocational Rehabilitation and Commission for the Blind -*

Title IV utilizes a VR specific case management program that allows for the capture of VR client participation with core partners including their participation in workforce services. Title IV, Oregon Commission for the Blind, tracks engagement with the public workforce system through Aware, its case management software.

*Trade Adjustment Assistance Program -*

Trade Act is a federal entitlement program, administered at the state level that assists workers whose jobs have been impacted due to foreign competition become re-employed in suitable work. The Oregon Employment Department developed and manages the Trade Adjustment Assistance Management Information System (TAAMIS), a web-based case management system. The system manages the participant's journey through the Trade Act program and provides most of the data needed for Trade Act's federal reporting requirements.

**Job Banks:**

*Browse Available Jobs -*

This is the State's main job bank for public viewing of job listings entered into the State's labor-exchange system, iMatchSkills, and those downloaded from the National Labor Exchange (NLx), managed by DirectEmployers. There are two categories of job listings posted to the job bank: self-referral listings, which allow job seekers to obtain contact information and apply directly without staff intervention; and managed listings, which require interested job seekers to contact a staff member for additional screening. Self-referral activity through the job bank is tracked in iMatchSkills for reporting purposes.

*Job Finder -*

This job bank is managed by OED's Communications and Research Division and is available through QualityInfo.org. Jobs are sourced from iMatchSkills, NLx, and Help Wanted Online. This job bank is like Browse Available Jobs but offers a number of additional search features such as distance and the ability to find related occupations based on search results.

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

### State Operating Systems that Support Implementation of Strategies

The WorkSource Oregon (WSO) system integrates the services provided by the Wagner–Peyster Act program, 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 2019, Oregon discontinued 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 any WSO services. Eligible participants now become co-enrolled in both Title III and Title I programs when they receive the first qualifying Title I service, presuming they have already received at least one T-III service, and vice-versa. This change has significantly lowered the number of customers co-enrolled in Titles I and III when compared to previous program years.

The WSO Operational Standards will be incorporated into state operational review 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 Standards in 2018. Updated in 2023 to reflect WSO operational changes, such as incorporating the delivery of employment services in a virtual format, the Standards provide a basic level of guidance to help ensure minimum requirements are met and standardization exists around operations and service-delivery in WorkSource Oregon centers, while providing flexibility to meet local needs. The Standards also encourage sustainable efforts to annually assess, and continuously improve area standards as the economy and local needs change.

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's current Memorandum of Understanding and Cost Sharing Policy and related guidance specifically identifies required partner programs to each Infrastructure and Other Shared Cost Agreement, how to address non-co-located partners in cost sharing, provides an Agreement template for local workforce development boards, and provides a description cost allocation methods. It includes the following component parts:

- 121 Attachment A - Required Partner Programs, Services, and Activities
- 121 Attachment B - Access to Required One-Stop Partner Programs and Services
- 121 Attachment C - MOU Development - Parts I & II
- 121 Attachment D - Infrastructure Funding Agreements, Cost Allocation Methodology, Other Shared Costs
- 121 Attachment E - References

These can be found on Oregon's WIOA Policies and Guidance website. This policy and related guidance have increased partner engagement and alignment in WSO Centers.

The core programs will work to craft and revise policies over time to support the state strategies, including co-enrollment 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 have 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.

As new policies are developed and published, they will be added to a publicly accessible website with Oregon's current WTDB and WIOA title I policies and guidance, currently located [here](#).

(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.

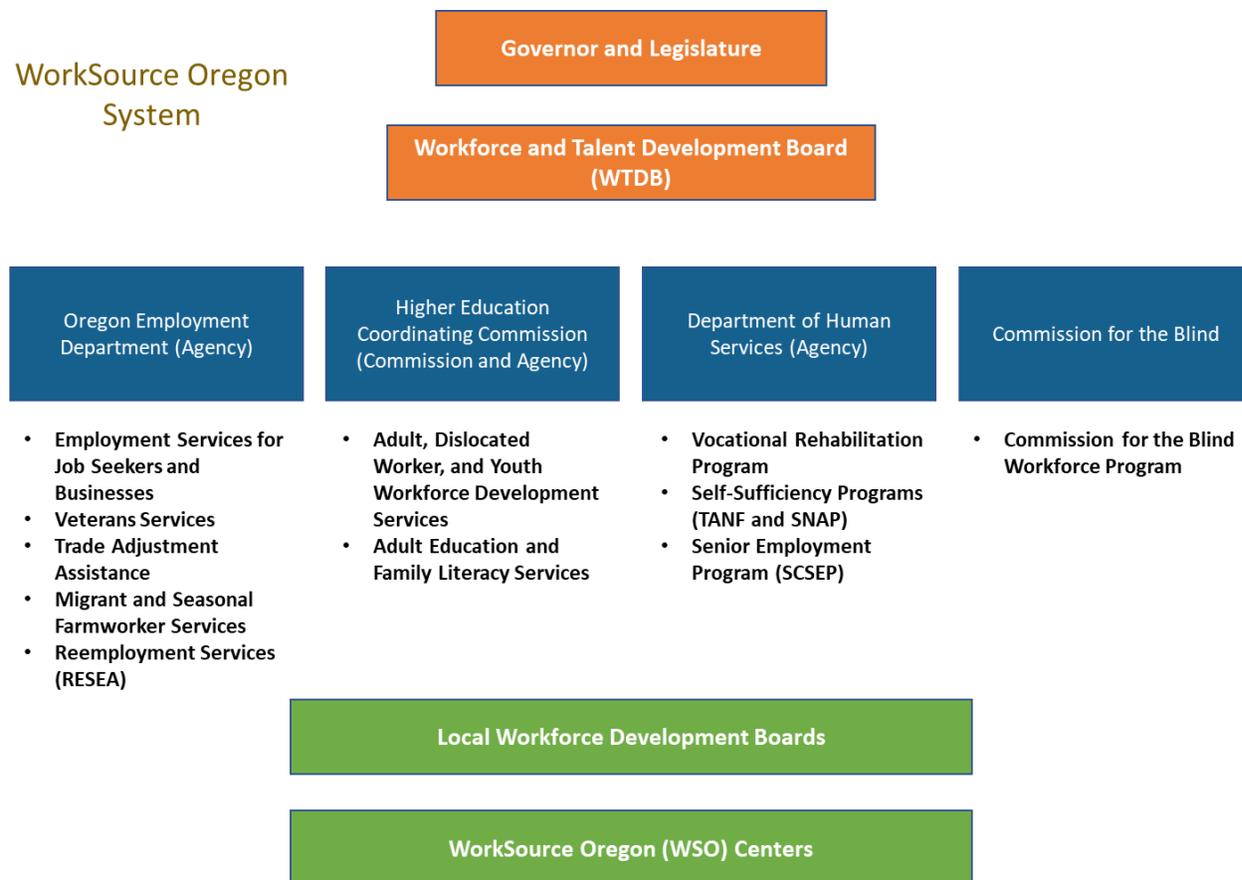
- (B) *State Board*. Provide a description of the State Board activities that will assist State Board members and staff in carrying out State Board functions effectively. Also, provide a membership roster for the State Board consistent with 20 CFR 679.110-120, including members' organizational affiliations and position titles.

### State Agency Organization

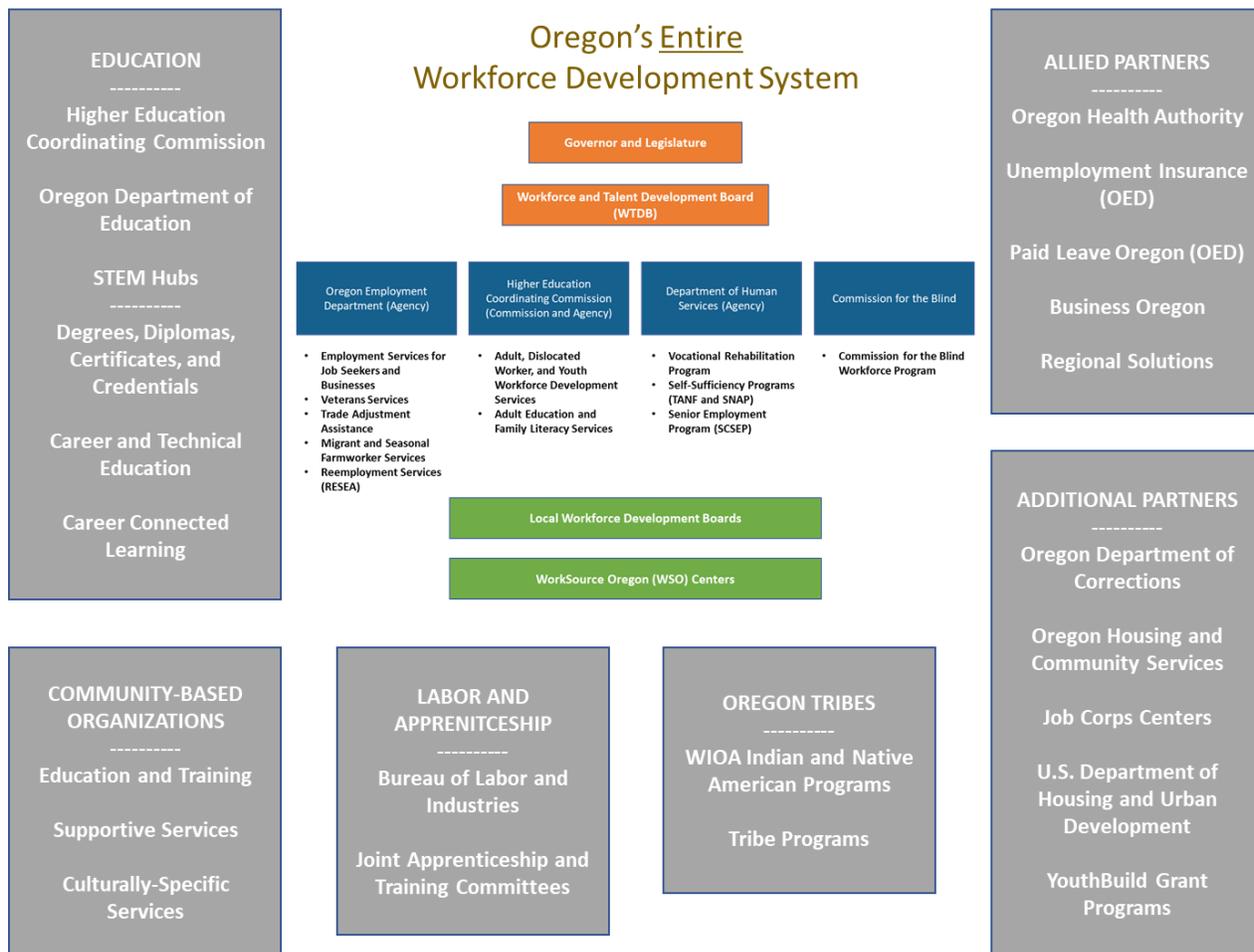
The workforce development system is the web of programs and providers, both public and private that prepare workers and job seekers with the information and skills needed to find or maintain employment and assist employers to employ skilled workers or to increase the skills of their existing workforce. 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 [WorkSource 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.

## WorkSource Oregon System



The WTDB recognizes that there is a there is significant workforce development activity occurring around WSO consistent with [Building a High-Performing State Workforce Board: A Framework and Strategies for States](#) by the National Governor’s Association and [A Call to Action for Workforce Development Boards](#) by the United States Department of Labor. The WTDB continues to work to influence, align, and leverage these activities.



**State Board**

The goal of the WTDB's [2023-2024 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 four key Imperatives:

- An inclusive workforce system that advances equitable prosperity.
- Clear understanding of and improved use and impact of the workforce system.
- Strategic and close alignment between education, economic development, and workforce development, including public and private partners.
- The WTDB is embraced by the Governor as an accountable convener, empowered facilitator, and informed advisor.

These Imperatives will be accomplished by the WTDB and the WTDB's Committees:

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

- Partnering with workforce, education, and training entities including Local Workforce Development Boards (LWDBs).
- 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.
- Sharing best practices and innovative solutions that are scalable statewide and across multiple regions within the entire workforce system.

The WTDB and Committees 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. There are three key Values that will drive all 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 consensus-building); 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 determine how the work is done, creating plans that will work for the unique characteristics of each area.

**Roster:**

*Representatives of Business -*

- Anne Mersereau (Chair), Portland General Electric (PGE), VP, Human Resources, Diversity & Inclusion
- Ken Madden (Past Chair), Madden Industrial Craftsmen, Owner
- Shari Dunn (Vice Chair), ITBOM, LLC, CEO/Principal
- Liisa Bozinovic, Oregon Bioscience Association, Executive Director
- Craig Campbell, OMIC Research & Development, Executive Director
- Charlie Hopewell, Jewett Cameron (ret.), Chairman of the Board
- Steve Johnson, MBCB, Managing Partner
- Kris Latimer, Knife River Training Center, Director
- Julie Lewis, PacifiCorp, Vice President of People, Senior DSO
- Soundharya Nagasubramanian, Vapotherm, VP, Connectivity & Data Management
- Skip Newberry, Technology Association of Oregon, President/CEO
- Frederick Pool, Knight Campus Graduate Internship Program, Senior Industry Advisor
- Wendy Popkin, Washington County Visitors Association, Vice President of Sales
- Mac Prichard, Mac's List, Founder

- Debbie Radie, Boardman Foods, Director
- Cathy Reynolds, Legacy Health, Director, Employment Strategy/Workforce Planning
- KS Venkatraman, Nvidia Corp, Senior Director, AI Computing
- Laurie Cremona Wagner, Oracle, VP Global Lead Management
- Jackie Wirz, Donate Life NW, Executive Director
- Vacant position (2)

*Representatives of the Workforce -*

- Dave Burger, UA290, Business Agent/Organizer - Central Oregon
- Laurie Chesley, Central Oregon Community College, President
- Heather Ficht, East Cascades Works, Executive Director
- Andrew Friedman, United We Heal, Trust Director
- Shane Nehls, Ironworkers Local 29, Vice President, Business Representative
- Harris Reibach, Confederated Tribes of the Grand Ronde, Director, Tribal Employment Rights Office
- Travis Reiman, Hillsboro School District, Superintendent
- Patsy Richards, Long-Term CareWorks at RISE, Director
- Chelsea Watson, Oregon AFL-CIO, Field & Research Director
- Vacant position (1)

*Representative of the Governor -*

- Vince Porter, Office of Governor, Economic Development & Workforce Policy Advisor

*Representatives of the Legislature -*

- Paul Holvey, Oregon Legislature, Representative
- Vacant position (1)
- Michael Dembrow, Oregon Legislature, Senator
- Kim Thatcher, Oregon State Legislature, Senator

*Representatives of Government -*

- Ben Cannon, Higher Education Coordinating Commission, Executive Director [Title I]
- Donna Lewelling, HECC Office of Community Colleges and Workforce Development, Director [Title II]
- David Gerstenfeld, Oregon Employment Department, Director [Title III/ Wagner-Peyser]
- Keith Ozols, Office of Vocational Rehabilitation, Director [Title IV]
- Craig Pope, Polk County, Commissioner [CEO]
- Martha Schrader, Clackamas County, Commissioner [CEO]
- Melisa Drugge, Business Oregon, Business Services Director [Economic Development]

*Others Designated by the Governor -*

- Adrien Bennings, Portland Community College, President

*Ex Officio Members -*

- Jana Bitton, Oregon Center for Nursing, Executive Director [Healthcare]
- Tony Frazier, KROC Center, Executive Director [Community-based Organization]
- Marc Overbeck, OHA Primary Care Office, Policy Lead, Health Care Workforce Initiatives Team [Oregon Health Authority]
- Vacant position (2)

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

(A) *Assessment of Core and One-Stop Program Partner Programs.* Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. 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. 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.

Assessment

**Core Programs:**

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 conducts annual assessments of Oregon's aggregate Title II performance and performance by local providers. Adult education and literacy providers are evaluated by individual provider. Overall program quality is measured by student measurable skill gain rate, pre-post assessment pair rate, and transition to either employment or postsecondary training, among other factors. Title II performance evaluations are supported by: regular submission of programmatic performance numbers, quarterly reporting of programmatic activities, and annual fiscal monitoring. Regular monitoring of program quality is used for continuous improvement activities, allowing CCWD to provide technical assistance based on assessment results.

Title III program data is validated for the PIRL quarterly report through quarterly file audits, yearly DOL required data validation, DOL Quarterly Report Analysis (this analysis includes a review of the data submitted, anomalies and outliers, and other potential data quality issues, which may indicate reporting inaccuracies), and the State's Quality Feedback Measures program (QFM is discussed below under "Additional Tools to Measure the Effectiveness of Core and Partner Program").

The TAA for Workers program data is validated for the PIRL quarterly report through TAADI (Trade Adjustment Assistance Data Integrity) tool, quarterly file audits, yearly DOL required data validation, and customer surveys.

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 combined 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 monthly 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.

The state’s Workforce and Talent Development Board, in partnership with local workforce development boards facilitated new legislation (Senate Bill 623, 2021) to establish the Continuous Improvement Committee (CIC) to assess the effectiveness of Oregon’s public workforce development system every even year.

Under SB 623, the CIC will identify and contract with an independent third-party entity to conduct an initial and bi-annual comprehensive assessment of the public workforce programs and services. The committee will ensure that input from a variety of Oregon’s historically marginalized groups, or stakeholder groups, is incorporated in the assessment.

Under SB 623, the focus of the assessment will be to:

- advance racial justice, equity, diversity and inclusion through the programs and services delivered through the public workforce system;
- align state and local efforts to improve the public workforce system in this state;
- support improvements that create a more comprehensive public workforce system;
- provide quality employment experiences and equitable outcomes for job seekers and businesses participating in workforce programs;
- improve the quality of workforce resources, programs and services made available through the public workforce system, and the transparency of information regarding

performance metrics and outcomes related to those resources, programs and services;  
and

- build on any current workforce program assessments that are required by law.

SB 623 also required the committee to present the results of each assessment, along with any recommendations for improvements, in reports to the Governor and to the interim committees of the Legislative Assembly related to workforce development every even-numbered year.

### **One-Stop Partner Programs:**

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 be 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.

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.

## **Additional Tools to Measure the Effectiveness of Core and Partner Programs:**

### *Quality Feedback Measures -*

The Workforce Innovation and Opportunity Act (WIOA) requires that state employment agencies review the quality of their services provided to Job Seekers and Employers. In Oregon, the performance review process is called Quality Feedback Measures, or QFM. WIOA also requires corrective action plans for performance that falls below State standards. In Oregon, these plans are called Coaching and Training Plans. The goals of the plans are to identify and inform staff of best practices regarding how to deliver and document services provided to the public and to analyze the root cause of issues so they can be addressed appropriately.

Under the State's QFM program, staff conduct monthly reviews of:

- Job Seeker profiles – These reviews are conducted only on “staff assisted” records, those that have received either the Welcome or RESEA Welcome Process Completed services by OED staff. JS profiles are reviewed by staff for accuracy and completeness. This includes documentation of occupational and career goals and actionable “next steps” for the customer.
- Job Listings – These reviews are conducted only on “staff assisted” records, those that have been matched to job seekers by staff. Job Listings are reviewed for accuracy, completeness, documentation of employer engagement and recruitment activities, and whether staff referrals met the employer's requirements.

The goal of QFM is to meet USDOL and WIOA expectations for quality assurance reviews of American Job Center performance, and to provide feedback for managers and technical staff regarding best practices and training or coaching opportunities for WSO Center staff. In 2023, OED made significant enhancements to streamline its QFM program. Process improvements to QFM included reduction in the number of reviewers for Job Seeker profiles and Job Listing records. This allowed for a more focused and consistent approach to how audits are conducted. Programming updates to the state labor-exchange system were also implemented to support current virtual statewide delivery of employment services. And finally, the State made significant changes to how results are captured and presented to staff by transitioning QFM reports to Tableau, a data visualization tool. Tableau reports provides a snapshot view of scores for each WorkSource Oregon office by area, month, quarter, and program year. This enables informed decision-making by leadership and improved results by evaluating reasons for criteria falling below the State standards.

### *Customer Satisfaction Surveys -*

The Customer Satisfaction Survey is part of Oregon's workforce performance measurement system. OED administers monthly surveys to measure the satisfaction of businesses and individuals who have received workforce services. Customer satisfaction measures can be aggregated by workforce development areas and a report period (year, month, or quarter). In addition, individual customer satisfaction measures can also be aggregated by demographics.

The Customer Satisfaction Survey also gathers data on several satisfaction drivers, including six Key Performance Measure (KPM) questions that are required by the Oregon State Legislature for both individual and business customers.

The Business Satisfaction Survey includes employers who closed a WSO job posting during the previous month. The same business can be selected for the survey only once per program year. The Job Seeker Survey includes customers who completed WOMIS Customer Registration during the previous month and/or filed an initial UI claim during the previous month.

Customers receive an email invitation to complete the survey using a web-based survey platform. The Job Seeker Survey is available in English and Spanish. Survey responses are the basis for the customer satisfaction performance measures, which are published on the Performance Measures page of the [www.QualityInfo.org](http://www.QualityInfo.org) website, available to the public.

Customers can also provide qualitative feedback by answering these questions: “If you were in charge of the Employment Department, what one thing would you change or add?” and “Could we have done anything to better help you? If so, please list your idea(s) in the space provided.”

These comments are shared with management every month, after survey responses are processed. Customer Comments Reports (one for individuals and one for business responses) provide management with greater detail about customer experience. WSO centers are required to develop, implement, and actively manage the two feedback loops aimed at aligning and improving services.

In summary, customer feedback is used to continually build on our integrated service delivery model that emphasis a customer-centric approach to meet the workforce needs of job seekers and employers.

#### *Business Intelligence Tool -*

In 2018, OED launched a project to utilize available data to tell a meaningful story about WorkSource success and areas for improvement, to achieve WorkSource Center strategic goals, and foster informed decision making. Using Tableau (a data visualization tool), a series of dashboard reports were developed for WorkSource managers to monitor key activities and trends related to claimant reemployment (including RESEA), business services (job matching and placement), and services to SNAP, Veterans, and Migrant and Seasonal Farmworker customers. Feedback from center management has been positive, noting the ability to view and analyze nearly real-time program data as being extremely helpful in managing programs and designing effective service delivery strategies. Additional reports are planned for 2024 and beyond, including ongoing data literacy training for staff.

(B) *Previous Assessment Results.* For each four-year state plan and state plan modification, 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), in accordance with methods described in 4(A) Describe how the State is adapting its strategies based on these assessments.

### Previous Assessment Results

#### **Title I and Title III Assessment Results:**

Below are Title I and Title III annual program performance results for Program Years 2021/2022 as reported to US DOL. While the State did not meet many of its negotiated targets in Program Years 2021 and 2022, PY 2022 performance for most program measures showed significant improvement over PY 2021. The exceptions were Dislocated Worker Credential Attainment Rate and Measurable Skills Gains and Youth Placed in Employment, Education or Training the second and fourth quarters after Exit.

The percentage of participants Employed in the second and fourth quarters after Exit, and Median Earnings of participants as measured in the second quarter after Exit are in large part affected by labor market conditions. Oregon's COVID restrictions began to ease in early 2021, with most restrictions lifted by June. This helped pave the way for continued economic recovery and by mid-2022, Oregon's unemployment rate stopped falling and jobs had recovered to pre-pandemic numbers. While this economic rebound is largely responsible for overall performance increases, it also shows that the State's operational standards, which are customer-centric and support an integrated service delivery model, are helping to connect Oregonians with employment and training services.

Despite these improvements, PY 2022 Titles I and III program performance as measured by the percentage of participants Employed in the second and fourth quarters after Exit for those facing barriers to employment (for example, low-income, long-term unemployed, displaced homemakers, individuals with disabilities, single parents, and those experiencing re-entry) were often significantly lower than overall statewide rates. Challenges in returning to work include lack of current and transferable skills, employment gaps, transportation, childcare, and other factors disproportionately affecting underserved and underrepresented communities.

WorkSource Oregon, through its WSO centers and network of service providers, continues to provide reemployment services to job seekers in person and virtually, focusing on Unemployment Insurance claimants, migrant and seasonal farmworkers, Supplemental Nutrition Assistance Program (SNAP) recipients, Veterans, and other targeted and underrepresented populations. Examples of reemployment services include virtual job-finding workshops; customized labor market and career information; local resource rooms equipped with computers, phones, and photocopy machines; job fairs and networking events; and support services (transportation assistance, etc.) through the SNAP Training and Employment Program and other grants. As part of the State's integrated service delivery approach, staff also work to

connect job seekers with workforce partners that provide targeted populations such as dislocated workers and youth with general career development and skills and training opportunities at community colleges and other sites statewide.

Finally, the Department continues to invest in business services, using a regional business services model to support workforce investment activities and meet the needs of local businesses in finding and building its workforce. This model has proven successful in building high-functioning business services teams which serve as a single point of contact for businesses across the state in rural and metro communities. Improved communication and coordination of service delivery between workforce partners has resulted from this braided service approach and allowed for more streamlined and targeted placement of WorkSource Oregon customers, particularly those facing barriers to employment.

Titles I and III Annual Performance – Program Year 2021

<b>Program</b>	<b>Measure</b>	<b>Negotiated Rate</b>	<b>Actual Rate</b>
Adult	Employment Q2	71.4%	66.8%
Adult	Employment Q4	71.0%	61.8%
Adult	Median Earnings	\$6,400	\$7,963
Adult	Credential Attainment Rate	60.5%	67.4%
Adult	Measurable Skill Gains	51.0%	61.4%
Dislocated Worker	Employment Q2	71.4%	64.7%
Dislocated Worker	Employment Q4	72.0%	62.2%
Dislocated Worker	Median Earnings	\$6,800	\$8,048
Dislocated Worker	Credential Attainment Rate	63.0%	68.6%
Dislocated Worker	Measurable Skills Gains	51.0%	61.5%
Wagner-Peyser	Employment Q2	68.2%	58.1%
Wagner-Peyser	Employment Q4	68.0%	62.9%
Wagner-Peyser	Median Earnings	\$6,600	\$7,370
Youth	Employment, Education, Training Q2	63.5%	69.5%
Youth	Employment, Education, Training Q4	63.0%	64.7%

Youth	Median Earnings	\$3,477	\$4,765
Youth	Credential Attainment Rate	68.4%	52.3%
Youth	Measurable Skill Gains	51.0%	42.3%

Titles I and III Annual Performance – Program Year 2022

<b>Program</b>	<b>Measure</b>	<b>Negotiated Rate</b>	<b>*Actual Rate</b>
Adult	Employment Q2	68.2%	69.4%
Adult	Employment Q4	68.6%	67.8%
Adult	Median Earnings	\$6,883.00	\$8,593.20
Adult	Credential Attainment Rate	60.5%	73.1%
Adult	Measurable Skill Gains	55.1%	66.1%
Dislocated Worker	Employment Q2	69.4%	67.5%
Dislocated Worker	Employment Q4	66.6%	64.6%
Dislocated Worker	Median Earnings	\$7,100.00	\$8,356.19
Dislocated Worker	Credential Attainment Rate	66.8%	66.1%
Dislocated Worker	Measurable Skill Gains	55.0%	61.3%
Wagner-Peyser	Employment Q2	68.2%	65.1%
Wagner-Peyser	Employment Q4	68.0%	63.1%
Wagner-Peyser	Median Earnings	\$7,000	\$8,419
Youth	Employment, Education, Training Q2	63.5%	64.0%
Youth	Employment, Education, Training Q4	61.7%	62.9%
Youth	Median Earnings	\$4,259.00	\$5,525.00
Youth	Credential Attainment Rate	56.1%	55.7%
Youth	Measurable Skill Gains	51.5%	44.2%

### Jobs for Veterans State Grant:

Program Year 2021

Program	Measure	Negotiated Rate	Actual Rate
JVSG	Employment Q2	55.0%	53.9%
JVSG	Employment Q4	56.0%	49.2%
JVSG	Median Earnings	\$6,900	\$6,477

Program Year 2022

Program	Measure	Negotiated Rate	Actual Rate
JVSG	Employment Q2	51.0%	56.5%
JVSG	Employment Q4	50.0%	55.2%
JVSG	Median Earnings	\$6,600	\$8,174

The State did not meet Program Year 2021 negotiated targets for all three measures (Employed Quarter 2 and Quarter 4 after Exit, and Median Earnings Quarter 2 after Exit). Performance was likely impacted by pandemic-era business closures and poor labor market conditions, compounded by WSO centers being closed to in-person traffic from mid-2020 thru early 2021. Performance turned around in PY 2022, with the State exceeding all negotiated targets and surpassing PY 2021 performance in all three measures. Contributing factors include pandemic-era restrictions easing in early 2021, leading to a much-improved economy and WSO centers reopening to in-person traffic in 2021.

### Effectiveness in Serving Employers:

Oregon continued its two pilot approaches to measure Effectiveness in Serving Employers: Employer Penetration Rate and Repeat Business Customer Rate. Program Year 2021 and 2022 rates are listed in the tables below. DOL has not established minimum standards for these measures.

Effectiveness in Serving Employers: Program Year 2021

Pilot Approaches	Numerator/Denominator	Rate
Employer Penetration Rate	9,015/176,293	5.1%
Repeat Business Customer Rate	8,222/16,343	50.3%

Effectiveness in Serving Employers: Program Year 2022

Pilot Approaches	Numerator/Denominator	Rate
Employer Penetration Rate	7,692/191,930	4.0%

Repeat Business Customer Rate	4,917/12,931	38.0%
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Definitions of the two pilot measures used to evaluate Effectiveness in Serving Employers:

- Employer Penetration Rate - The percentage of establishments using core program services out of all Oregon establishments.
- Repeat Business Customer Rate - The percentage of employers receiving core program services more than once in the previous three years.

Unfortunately, both measures dropped between PY 2021 and PY 2022. As a result, Oregon is exploring trends in this measure to identify any potential changes to its service delivery model and effects to future performance outcomes.

**Customer Satisfaction Survey Results:**

The Job Seeker and Business surveys track two categories, satisfaction with ‘Overall Quality’ and ‘Percentage of Customers Very Likely or Somewhat Likely’ to recommend WorkSource Oregon services.

*Job Seeker Satisfaction Results*

Program Year 2022 satisfaction rates for both categories showed a slight improvement over PY 2021 rates and were at or near pre-pandemic rates.

*Business Satisfaction Results*

Historically, Business Satisfaction rates have been somewhat inconsistent and have trended downward during tight labor markets. These trends continued in Program Year 2022, although the rates are still trending somewhere between slightly better than pandemic rates to slightly lower than the pre-pandemic rates. Business satisfaction has not yet seen a full return to its pre-pandemic rates.

Of note, OED experienced a significant shift in staffing in relation to the pandemic, with a large contingency of both management and front-line staff coming on board during or after. This shift has required a focus on staff education to bring knowledge forward to meet current operational needs. The expectation is to see continued improvement in customer satisfaction rates as a result, along with OED’s movement towards workforce operations modernization, allowing progress in system improvements.

**Quality Feedback Measures:**

As mentioned earlier (in Section A), OED has selected certain criteria to review each month for a sample set of job seeker and job listing records. The criteria reflect the priorities outlined in the WorkSource Oregon Standards for serving customers. The state is pleased to note that PY 2022 performance matched or exceeded that of PY 2021 in four out of the five job seeker categories, and in nine out of the ten job listing categories. Several changes implemented in PY 2022 helped improve outcomes. These include business process improvements to the program

(as discussed above in Section A), QFM refresher training for staff, and ongoing dialogue between QFM reviewers and management to share information and best practices.

### **SNAP Training and Employment Program (STEP):**

#### *Job Training -*

Training continues to be a focus of the STEP program, with the program aligning tuition funding to the priorities described by Oregon's Workforce Board's Sector Partnerships and Priority Occupations. This work has been impactful in helping to connect STEP participants with training opportunities. Between July 2021 and June 2023 (Program Years 2021/2022), the program enrolled 109 STEP participants into Basic Education/Foundational Skills Instruction; 1,152 STEP participants into Career, Technical, or Other Vocational Training courses; and 448 STEP participants into Short-Term Training. Through these programs, STEP participants received licensing and other credentials in these and other occupations: Commercial Truck Driver, Licensed Practical Nurse, Dental Assistant, Pharmacy Technician, GED – Science Module, Accountant, Peer Support Specialist, Medical Billing and Coding Specialist, Automotive Technician, Drone Pilot Training, Certified Nurse Assistant 1 & 2, Phlebotomist, Certified Alcohol and Drug Counselor, Grant Writer, Home Inspector, and Welder.

#### *Job Placement -*

From July 2021 through June 2023 (Program Years 2021/2022), staff documented 5,074 placements of STEP participants. Of that total, 2,325, (46%), of those placements did not include industry information. However, we know that 535, (11%) of the placements were in Health Care; 439, (9%) were in Transportation and Warehousing; 385, (7%) were in Accommodation and Food Service; 331, (6.5%) were in Retail Trade; 257, (5%) were in Manufacturing; and 173, (3%) were in Construction. The remaining 12.5% of the placements were in Agriculture, Wholesale Trade, Utilities, Finance and Insurance, Arts, Entertainment, and Recreation, Educational Services, and Real Estate.

#### *Housing and other Strategic Support Services -*

Housing is a critical need in most every community in Oregon and it impacts historically underserved and low-income communities at higher rates than other Oregonians. To address this issue, the STEP program in Program Year 2021 introduced a series of "Strategic Support Services" to provide a bridge for STEP participants who obtained full-time employment (32-hours or more per week) to make the transition away from the SNAP program and onto self-sufficiency. With this strategic support, the STEP participant is provided the opportunity to save portions of their first one or two paychecks and then assume their rent or mortgage payment in the third month of employment. Between July 2021 and June 2023 (Program Years 2021/2022) this strategic housing support was provided to 294 STEP participants at an average of \$1,009.57 per participant. Other strategic support services provided to STEP participants during this time period included automobile repair, automobile insurance, utilities, and childcare.

*Digital Inclusion and Connectivity -*

The STEP program continued its partnership with Free Geek (an Oregon-based non-profit focused on digital inclusion and technology access), connecting 765 STEP participants with laptops and internet access in Program Years 2021/2022 to ensure participants are online and connected in order to access training and employment opportunities.

SNAP E&T Annual Report - Fiscal Year 2022 (Oct 2021 to Sept 2022)

Reporting Measure	Value	Numerator	Denominator
1. Unsubsidized employment in 2 <sup>nd</sup> quarter after completion in E&T	52.93%	5,949	11,240
2. Median Quarterly Wages in 2 <sup>nd</sup> quarter after completion of participation in E&T	\$5,830	N/A	N/A
3. Unsubsidized employment in 4 <sup>th</sup> quarter after completion of participation in E&T	50.83%	4,098	8,062

SNAP E&T Annual Report - Fiscal Year 2023 (Oct 2022 to Sept 2023)

Reporting Measure	Value	Numerator	Denominator
1. Unsubsidized employment in 2 <sup>nd</sup> quarter after completion in E&T	56.74%	7,712	13,591
2. Median Quarterly Wages in 2 <sup>nd</sup> quarter after completion of participation in E&T	\$ 6,401	N/A	N/A
3. Unsubsidized employment in 4 <sup>th</sup> quarter after completion of participation in E&T	19.85%	4,285	21,582

The State is pleased to report that unsubsidized employment and median wages in the second quarter improved significantly from FFY 2022 to FFY 2023. These measures are in part affected by labor market conditions, which have improved since the pandemic. The State will be exploring the decrease in unsubsidized employment in FFY 2023 but believes poor economic

conditions during the timeframe in which this measure was calculated likely contributed to the decrease.

### **WorkSource Oregon Business Services:**

Program goals include a referral to hire ratio target of 5-1, increasing the percentage of staff assisted job listings filled to 70%, and filling staff-assisted job listings within 30 days. The state is pleased to report that its referral to hire ratio was 2.11-1 for PY 2021 and 2.75-1 for PY 2022, besting its target of 5-1. The percentage of job listings filled was 46% for PY 2021 and 40% for PY 2022. It's important to note that while the goal was 70%, the historical rate has been around 50% and increasing the percentage is not easy. Business Services staff have reported a significant change post pandemic in labor market participation, with many job seekers choosing to retire, relocate or opt out of the regular labor market altogether.

Additionally, with the increase of employers using WorkSource as just one form of talent recruitment in addition to using other job boards, Business Services staff find themselves increasingly at a disadvantage without an "exclusive recruitment" agreement with the employer. This shifting dynamic may be partially responsible for the percentage of job listings filled in PYs 2021/22 being lower than PYs 2019/20. And finally, the average number of days to fill job listings was 24 days for both PY 2021 and PY 2022. These outcomes are well below the target of 30 days and higher than those reported in PYs 2019/20.

Business services continued administering the Grow with Google scholarship program. This program provides the opportunity for individuals to skill up in nine different courses including IT Support, User Experience Design, Data Analytics, Cybersecurity, Project Management and more with little to no experience. To date, OED has provided scholarships to 2,150 customers of WorkSource with about 75 completing certification and obtaining meaningful wage jobs with career advancement opportunities. These scholarships were available to unemployed, underemployed, incumbent workers and any Oregonian who was a customer of WorkSource. This program ended December 2023.

The Statewide "Work Ready" program was created in 2021 in partnership with WorkSource Oregon staff, workforce partners and Workforce Boards. The Work Ready Program is designed to identify and promote validated job seekers directly to employers to expedite their employment. This program helps the job seeker *Get Connected* to valuable resources, create a job seeker profile that will *Get Noticed*, and ultimately, *Get Hired* by local employers. The program has been implemented in all 36 centers and introduced to local boards and partners across Oregon.

Non-numerical goals include maintaining awareness of candidates from targeted populations to include those served by federal programs such as Reemployment Services and Eligibility Assessment, Migrant and Seasonal Farmworker, Veterans, Vocational Rehabilitation, Oregon Commission for the Blind, and SNAP Training and Employment. To maintain this awareness and build partnerships, business services staff regularly meet with federal program coordinators

and other workforce partners. Business services also perform outreach to locally defined sectors.

Business staff continued to utilize the WSO's LinkedIn recruiter platform to help fill positions by sourcing candidates that are not within the labor exchange system already. This process brings new candidates into the WorkSource system and provides them with the knowledge of programs and services to address the talent gap beyond recruitment. The partnership with LinkedIn began July 2020 and to date has generated almost 20,000 followers and gained national recognition.

### **Reemployment Services and Eligibility Assessment Program:**

The Reemployment Services and Eligibility Assessment (RESEA) program is both a federal initiative and an important element of OED's strategy to help Unemployment Insurance (UI) benefit claimants become reemployed. Claimants selected for participation are required to meet one-on-one with staff and complete an initial RESEA interview. If participants claim for six consecutive weeks after their first appointment and have no earnings, they are selected for a subsequent interview. Overall selection for participation was still low for PY 2021 due to staffing reallocations from the pandemic and this can affect the measures somewhat.

In PY 2021, 23,335 claimants were selected for participation and 11,109 claimants attended their initial RESEA interview, with a completion rate of 47.6%. Due to the pandemic, in that year only 903 participants were selected for a subsequent RESEA interview and 39.4% attended. In PY 2022, 58,755 claimants were selected for participation and 37,935 attended the initial interview, with a completion rate of 65.6%. 10,493 were selected for a subsequent RESEA conversation and 82.3% completed. This is a 35% increase in the completion rate for the initial RESEA conversation and a 108% increase for the subsequent conversation.

Three RESEA outcome trends from Program Years 2021/22 were recently examined: 1) average number of weeks of benefits received, 2) percent of participants reemployed within their benefit year, and 3) average weeks to reemployment. The number for average weeks to reemployment is based on a sample of roughly 4% of the total population based on information from the National Directory of New Hires. The percent of participants reemployed within their benefit year uses quarterly wage data reported directly to OED, resulting in much higher accuracy.

The average number of weeks of benefits remained almost exactly the same at 9.7 weeks. The percent of participants reemployed within their benefit year decreased from 91% to 82%. This is probably a result of broader selection criteria in Program Year 2022. The average weeks to reemployment increased from 13.6 to 14. The outcomes reflect economic growth and record low unemployment numbers in Oregon during the reported period. In short, assessment of the RESEA program shows that it has been effective in helping speed claimants return to work and in preventing and detecting UI overpayments.

- (C) *Evaluation.* Describe how the State will conduct evaluations and research projects of activities carried out in the State 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 (WIOA Section 116(e)).

### Evaluation

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.

### **Evaluation of Reemployment Services and Eligibility Assessment Program:**

The Reemployment Services and Eligibility Assessment (RESEA) program is both a federal initiative and an important element of OED's strategy to help Unemployment Insurance (UI) benefit claimants become reemployed. Selected claimants are required to meet one-on-one with staff and complete an initial RESEA interview.

All unattached claimants continue to be selected for an initial RESEA conversation, rather than those identified as likely to exhaust benefits. If participants claim for six consecutive weeks after their first appointment and have no earnings, they are selected for a subsequent interview. This new selection method started in 2021 and continues to provide a larger, and more diverse population of claimants who receive RESEA services.

To evaluate the effectiveness of these changes and to ensure that reemployment services provided to RESEA participants are impactful (defined by the U.S. Department of Labor's Clearing House for Labor and Research as having a "high" or "moderate" causal evidence rating – TEGL 6-19), in PY 23, the state began the process to secure a contract with a vendor to evaluate its entire RESEA program. The state plans to use an impact study using the most rigorous and appropriate design feasible. This will be a multi-year evaluation and changes to the program may be implemented while still under evaluation based on preliminary evidentiary findings or results. The evaluation is tentatively scheduled to start late Program Year 2023.

RESEA program staff are engaged in an ongoing dialogue with Oregon's WIOA partners and local workforce development boards. These conversations will continue to build on the infrastructure and integration between RESEA and WIOA. Innovative interventions or service delivery strategies that demonstrate improved employment outcomes of RESEA participants and reduce the average number of weeks claimed by participants will be a priority in our collaborative systems alignment work, as we focus on promoting the broader vision of WIOA of increased program integration and service delivery for job seekers, including claimants.

The RESEA program in PY 2020 piloted a special workshop titled Rethinking Job Search (Rethinking). Using cognitive-behavioral techniques to enhance motivation and self-efficacy in job-search activities, Rethinking aims to bolster job seekers' confidence in their ability to be quickly reemployed. The content is delivered in 12 facilitated sessions with a focus on management of thoughts and emotions, accountability, self-esteem and personal responsibility, and managing goals.

This pilot varied from previous larger-scale Rethinking projects in that workshops were conducted in a virtual service-delivery format because of COVID. Program objectives were to identify the redeployed program's feasibility, effectiveness of delivery, and short-term outcomes. The following are short-term outcomes of the Rethinking pilot that pertain to emotional intelligence knowledge, and attitudes of participants. Based on a formal evaluation of the pilot, Rethinking participants:

- *Improved their knowledge of emotional intelligence (EI) concepts.* Participants experienced greater gains in EI knowledge than non-participants.
- *Gained confidence and motivation for job-searching.* Most respondents (20 of 24) reported improved confidence. All respondents reported either increased or stable motivation. These changes were sustained after program completion.
- *Became re-employed.* 42% of Rethinking participants reported finding work within 30 days of completing the Rethinking training.

Based on the pilot's success, the state has decided to launch the program as a permanent fixture and will begin offering the program to claimants in PY2024.

### **Performance Reporting Information System:**

Oregon's Performance Reporting Information System (PRISM) produces information about the effectiveness of workforce system programs and services. This performance data helps policymakers, administrators, and educators make informed program and service delivery decisions. PRISM generates several performance reports that are aligned with the federal measures, including employment rate second quarter after exit, employment rate fourth quarter after exit and median earnings second quarter after exit in addition to several performance reports for Oregon-specific performance measures. These system-wide performance data are available at [www.qualityinfo.org/pm](http://www.qualityinfo.org/pm).

The following workforce and education programs submit participant data to PRISM: WIOA Title I (Adult, Dislocated Worker), WIOA Title III (Wagner-Peyser), SNAP Employment and Training Program, TANF, Department of Education K-12, Community Colleges, Public Universities, Apprenticeship Program, Trade Adjustment Assistance, and Unemployment Insurance. Discussions are underway to include Titles II and IV. Participant data collected by PRISM includes demographics, services received, employment and earnings outcomes, and postsecondary educational attainment.

While this format is different from a formal evaluation study, the nearly real-time information, 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. In addition to the performance measure-specific reports available on [www.qualityinfo.org/pm](http://www.qualityinfo.org/pm), a PRISM steering committee with representatives from each program participant listed above define research topics that utilize performance measure data in the PRISM system for further study. Research results are published in the form of articles on [www.qualityinfo.org](http://www.qualityinfo.org).

- (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 the methods and factors the eligible agency will use to distribute title II funds.

CCWD awards competitive grants to eligible providers in accordance with the requirements of section 231 of WIOA. Eligible Title II provider applicants are 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; and
- 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.

The competitive Request for Application (RFA) process is conducted in an open and fair manner. All information related to the RFA is provided on a publicly 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 ensures 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.

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. Describe data-collection and reporting processes used for all programs and activities, including the State's process to collect and report data on co-enrollment, and for those present in the one-stop centers.
  - (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.

**Modernization Projects:**

The Oregon Employment Department is currently undertaking a multi-year initiative focused on transforming the agency's business processes and core technology systems supporting the receipt of unemployment insurance and Paid Leave Oregon contributions, payment of unemployment insurance and Paid Leave Oregon 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 platforms 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. The first project, focused on implementing the technology solution and business processes for unemployment insurance and Paid Leave Oregon, is currently in the execution phase and on schedule.

The second project – the Workforce Modernization Project – will replace the state's labor exchange and management information systems supporting employment services, business services, Jobs for Veterans State Grant, Monitor Advocate System, Foreign Labor Certification, Supplemental Nutrition Assistance Program (SNAP) Training and Employment Program (STEP) and Able-Bodied Adults without Dependents (ABAWD), Trade Adjustment Assistance (TAA), and Reemployment Services and Eligibility Assessment (RESEA). Through collaboration with WIOA partners, the project seeks better integration and data sharing to not only improve efficiencies in service delivery across agencies, partners, and programs, but also support data-informed policy making.

The Workforce Modernization Project is currently in the planning phase. As part of the planning efforts and to engage partners in the project, the project has initiated an engagement board and chartered a data workgroup to gather and document information about our data exchanges and interfaces across partners and programs. Both the engagement board and data workgroup include individuals from WIOA Titles I, II, III, and IV. The information gathered and documented from these efforts is foundational to defining the project scope and identifying business requirements; determining the impact on employees, customers, partners, and stakeholders; and envisioning a future that supports efficient exchange of information, better integration, improved service delivery across programs, and ultimately enhanced customer experiences.

**Current Systems:**

Currently, some service and customer data reside 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.

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, iMatchSkills (labor exchange), Trade Adjustment Assistance Management Information System (TAAMIS), I-Trac (the MIS for WIOA Title I Adult, Dislocated Worker, and Youth programs), 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 continued fine-tuning, enhancements, and troubleshooting.

At this point in time, the state's core programs utilize the Performance Reporting Information System (PRISM) as an accountability system for tracking outcomes across programs. PRISM works by matching information about customers' workforce program participation against quarterly Unemployment Insurance wage records, data from Oregon's education system, and feedback obtained through customer satisfaction surveys. This information is combined into seven performance measures that describe customer outcomes and experiences after they have received workforce and education services. Five of these measures relate to customers' employment and earnings and two-gauge customer satisfaction among businesses and individuals.

Title II collects programmatic data in CASAS TOPSPro Enterprise and converts that individual data into Oregon's Community College and Workforce Development data management system, D4A. Discussions are underway to include Title II in PRISM. The data available in PRISM is aggregate and not used for program improvement purposes. CCWD monitors data submitted by individual adult education and literacy providers as it is transmitted in CASAS TOPSPro Enterprise for programmatic performance and continuous improvement purposes.

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) began 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 through the State's labor-exchange system, iMatchSkills. It has also improved program reporting and analysis. In 2023, DHS implemented its Integrated Eligibility Determination Project which has further streamlined and improved the timeliness and accuracy of SNAP data transferred to OED.

In 2020, OED began receiving a file transfer of apprenticeship data from the state's Bureau of Labor and Industries, which oversees the state's Apprenticeship program. This data is now 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.

Currently, Oregon does not employ a common exit for all the WIOA Titles I and III core programs, or the TAA for Workers program, but is making efforts towards aligning and modernizing its management information systems and State policy for its implementation. Oregon supports and promotes co-enrollment between all programs for which individuals have been determined eligible.

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; iMatchSkills, the state's labor-exchange system for job matching and referral and services tracking under WIOA Title III, Wagner-Peyser; I-Trac, the management information system for WIOA Title I Adult, Dislocated Worker and Youth programs; and the TAA Management Information System. These systems are sufficiently connected to allow WorkSource Oregon staff to track participation in Titles I and III and TAA for Workers program. Titles II and IV track data outside of the WOMIS environment; therefore, the state is not able to track participation in these titles against participation in Titles I and III and TAA for Workers program.

At this time, updating WOMIS to track program participation across all core programs would be a complex and costly undertaking. Applications within the WOMIS environment – Customer Registration, iMatchSkills, and TAAMIS – are in scope to be replaced as part of the Workforce Modernization Project. As part of this project, the state plans to improve integration and enhance service delivery across various programs.

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 (iMatchSkills); 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.

Title II tracks participants who have exited into employment and postsecondary education. This is performed through a data match to determine employment and earnings of adult education and literacy participant's following program exit. The data match occurs through an agreement with the Oregon Employment Department and matches data on either social security numbers or first and last names, with date of birth. Participants are tracked into postsecondary education, through Oregon's Office of Community Colleges and Workforce Development student database, D4A, using social security numbers and universal student identification numbers. In instances where social security numbers are not populated in the database, a data match is conducted using first and last names, along with date of birth.

Title IV, Vocational Rehabilitation (VR), utilizes a specific case management program that allows for the tracking of client participation with core partners, including their participation in workforce services. This information is reported to the Department of Education (RSA) quarterly, but as we move forward in relation to technological integration of all workforce participants will be utilized to demonstrate Title IV clients' commitment to the workforce. Statewide integration of data capture and reporting systems is ongoing.

Title IV, Oregon Commission for the Blind (OCB), tracks customer engagement with the public workforce system through Aware, its case management software. Relevant data is reported to the Department of Education (RSA) quarterly. Wage record matches are used to verify employment and wages following placement, via a data sharing agreement with the Oregon Employment Department. These activities are ongoing. OCB will continue to work with other state partners to develop and streamline processes for more robust tracking and data sharing of OCB client intake and participation in Oregon's public workforce system.

- (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 state Workforce Talent and Development Board (WTDB) has established a number of priorities including:

- promoting accountability among public workforce partners;
- identifying barriers, providing solutions, and avoiding duplication of services;
- increasing understanding and utilization of the workforce development system; and
- coordinating and streamlining 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 one with effective accountability mechanisms. The WTDB continues to support data sharing and alignment at the state level (see III.b.6.A.ii.) and will advocate for policy changes as needed to establish new or expanded data sharing agreements. To that end, the WTDB is represented on the Workforce System Executive Team (WSET). WSET is comprised of agency strategic and operational leaders for workforce programs and services including the WTDB, Titles I, II, III, and IV, and self-sufficiency (SNAP and TANF) employment and training programs.

The WorkSource Oregon (WSO) Operational Standards, developed by WSET and adopted by the WTDB, is a system-wide expectation for aligned service delivery which is supported by aligned technology and data systems. In addition, the WTDB is represented on the PRISM Steering Committee which informs the WTDB and the Governor. Performance Reporting Information System (PRISM) produces information about the effectiveness of workforce system programs and services and relies on aligned technology and data systems. This performance data helps the Governor and policymakers make informed program and service delivery decisions.

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

The WorkSource Oregon Management Information System (WOMIS) is the statewide electronic information environment used in one-stop centers that supports the mission and vision of WorkSource Oregon. The WOMIS environment is a network of applications that serve job seekers, staff and employers. WOMIS applications include Customer Registration, the State's common registration portal; I-Trac, the third-party case management system for Title I Adult and Dislocated Worker currently used by all LWDBs; iMatchSkills (iMS), the state's labor-exchange and tracking system for Title III Wagner-Peyser; and the Trade Adjustment Assistance

Management Information System (TAAMIS), the state's case management system for Trade Act.

Extensive training is provided to staff in one-stop centers regarding proper use of WOMIS applications to help ensure accurate and timely data collection for program reporting and analysis. Extensive system edits are also built into applications to reduce user errors and promote accurate collection of data.

Data from the various applications are used for required federal program reporting, operational reporting, and WorkSource Oregon performance reporting. Specifically, the WOMIS environment includes applications that support:

- Customer Registration
- Labor Exchange (Job Matching and Referral and Business Services)
- TAA for Workers program
- Workforce Training and Adult, Dislocated Worker and Youth Case management (Title I)
- State and Federal Reporting

**Customer Registration:**

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 TAA for Workers program 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;
- Capture program eligibility components for the Wagner-Peyser (W-P), Adult and Dislocated Worker (DW) programs, and 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 an 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.

The TAA for Workers 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 managed the TAA Management Information System (TAAMIS), a web-based application that supports the administration of participant activity while in the TAA for Workers

program. 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.

### **State and Federal Reporting:**

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, and Frances (OED's new UI data Information System) is used to generate the Participant Individual Record Layout (PIRL) for Titles I and III, including Jobs for Veterans State Grants (JVSG) and TAA for Workers program federal reporting purposes.

The state has established data validation procedures for PIRL data elements in accordance with Training and Employment Guidance Letter 07-18.

For the TAA for Workers program 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 for Workers program federal reports.

### **Data Collection and Reporting Processes – Title II:**

All WIOA Title II data are reported both locally and statewide using CASAS 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 the performance management software, data quality checklist, database administrator 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 and 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 CASAS TOPSpro Enterprise 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, Integrated English Literacy and Civics Education (IELCE), and Corrections. 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 portal.

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.

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 Oregon's Office of Community Colleges and Workforce Development's (CCWD's) student database, D4A, using the student's social security number and universal student identification number.

#### **Data Collection and Reporting Processes – Title IV:**

Title IV utilizes a VR specific case management program that allows us to capture VR client participation with core partners including their participation in Workforce services. This information is reported to the Dept of Education (RSA) quarterly but as we move forward in regard to technological integration of all workforce participants will be utilized to show Title IV clients engagement in the workforce system. Statewide integration of data capture and reporting systems is ongoing.

Title IV Blind (OCB) tracks engagement with the public workforce system through Aware, its case management software. Relevant data is reported to the Department of Education (RSA) quarterly. Wage record matches are used to verify employment and wages following placement, via a data sharing agreement with the Oregon Employment Department. These activities are ongoing. OCB will continue to work with other state partners to develop and streamline processes for more robust tracking and data sharing of OCB client intake and participation in Oregon's public workforce system.

VR and OCB will be working on independent agreements and procedures to obtain data from our postsecondary 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.

(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.

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. 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 Oregon 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 Oregon Employment Department. VR/OCB will check clients' employment status as per WIOA Performance Measure for retention at the 2nd and 4th 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.)

### **Unemployment Insurance Wage Record Data:**

Employers are required to report wage records to the Unemployment Insurance (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 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 Communication and Research Division (for developing labor market information), and other state programs (such as Vocational Rehabilitation for performance reporting).

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.

In addition to Oregon wage records, PIRL records are cross matched against State Wage Record Interchange System (SWIS) data.

(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 (CCWD), 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. Regulatory safeguards required by HIPPA, FERPA and any other Program specific rules and regs are adhered to by said agencies. Individual Programs and agencies have privacy and security training that is required of their employees. These protocols are observed at the WorkSource Oregon one stop centers and by the individual entities and partners as they coordinate the delivery of workforce and employment services to Page 119 their individual and mutual clients. 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.

In accordance with FERPA, Title II providers are required to follow policies as outlined in the Oregon ABS Policy Manual. Programs must provide an opportunity for students to consent or decline release of their information by informing students, in writing, that their personal and confidential information will only be shared with their written consent. Programs must inform students, in writing, of the student's ability to revoke consent to release information. Programs are prohibited from sharing personal confidential information or records if the student declines to give, or revokes prior, written consent. Programs must not deny services to students who do not authorize release of information. Programs must inform students that declining to share

information will not affect their eligibility for services. Programs must keep the signed and dated consent forms and revocation forms on file in accordance with record retention policies.

Additionally, to meet federal reporting requirements, CCWD shares (via data matches) personally identifiable information of Title II students with outside organizations such as the Oregon Employment Department, in accordance with established data sharing agreements. This data matching allows the Oregon to report on Title II outcomes measures such as employment, earnings, and entry into postsecondary education for Title II students, as required in WIOA. Personally identifiable information sent to outside organizations is either returned to CCWD or destroyed upon completion of data matching.

Title IV – Blind (Oregon Commission for the Blind, OCB) follows privacy guidelines as articulated in The Oregon Commission for the Blind’s Vocational Rehabilitation Manual. OCB has established safeguards to protect the privacy and confidentiality of client information and data. These safeguards include: data sharing and confidentiality agreements, annual staff confidentiality training, client privacy education, release of information processes and electronic privacy protocols.

Clients are informed that personal information will only be shared outside of OCB with prior written consent through OCB’s Rights and Responsibilities document. OCB must retain signed and dated release of information forms in accordance with record retention policies and protocols. OCB has established confidentiality and data sharing agreements with outside entities, such as the Oregon Employment Department, when data for Federal reporting requirements is needed.

Finally, when releasing and publishing data, all relevant agencies aggregate data when possible, and suppress data elements or responses that could be used to identify an individual participant (or small number of participants).

(7) Priority of Service for Veterans.

- (A) Describe how the State will implement the priority of service provisions for covered persons 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.

Priority of Service for 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). 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 Oregon (WSO) 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.

### **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:
  - Service in the active military, naval, air, or space service; and
  - Discharged or released therefrom under conditions other than dishonorable.
- *Eligible Spouse* – means a spouse of any of the following:
  - a) A spouse of any veteran who died of a service-connected disability.
  - b) 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:
    - i) Missing in action;
    - ii) Captured in the line of duty by a hostile force; or
    - iii) Forcibly detained or interned in the line of duty by a foreign government or power.
  - c) A spouse of any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs.
  - d) A spouse of any veteran who died while a disability so evaluated was in existence.

### **Implementation:**

Local Workforce Development Boards (LWDB) will ensure their local plan provides clear strategies and policies for providing Veterans and Eligible Spouses with the highest quality of service at every phase of service delivery. Policies shall be implemented to ensure Veterans and Eligible Spouses are aware of:

- their entitlement to priority of service;
- the full array of programs and services available to them; and
- any applicable eligibility requirements for those programs and/or services.

Priority of Service for 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 Eligible Spouse receives access to the service or resource instead of, or before the non-covered person. For example, this could mean:

- the Veteran or Eligible Spouse receives access to the service or resource earlier in time than the non-covered person; or
- if the service or resource is limited, the Veteran or Eligible Spouse receives access to the service or resource before the non-covered person.

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

- Business Services staff notifying Veterans and Eligible Spouses that are active in the state's labor-exchange system (iMatchSkills) of new job listings when the covered persons job preference locations and occupational experience align with job listing.
- Referral of qualified Veterans and Eligible Spouses to new job openings, especially federal contractor job listings, prior to all non-covered person job referral activity.

It is the responsibility of the WSO centers to ensure that Veterans and Eligible Spouses 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 WSO centers. Priority of Service for Covered Persons information is available on the Oregon Employment Department website and is included in the Oregon Employment Department office's phone greetings.

WSO centers will follow their office plan related to implementing Priority of Service for Covered Persons. At a minimum, these plans must:

1. **Identify** Veterans and Eligible Spouses eligible for priority of service at point of entry (in-person, phone, virtual, state self-registration system, and contacts via social networking websites).
2. **Inform** Veterans and Eligible Spouses of their priority of service entitlement, to include the full array of programs and services available to them.
3. **Notify** appropriate WSO staff, following local office procedures, that a Veteran or Eligible Spouse needs services.

To ensure that Veterans and Eligible Spouses are made aware of Priority of Service for Covered Persons, the following methods will be used to emphasize our commitment:

- A. **WorkSource Oregon Management Information System (WOMIS) Home Page for Job Seekers:** The state uses an electronic notice titled "*Priority of Service Entitlement with WorkSource Oregon*" to inform Veterans and Eligible Spouses of their covered persons status. This notice, displayed to job seekers on the WOMIS Home Page following their initial registration, provides information about their eligibility for priority of service, including examples of services they are eligible to receive through WorkSource Oregon.
- B. **iMatchSkills:** The state's labor-exchange system "staff view" has a Covered Persons Banner in the iMatchSkills Job Seeker Profile to assist staff with identifying covered

persons. Covered Persons criteria is built into the Job Listing Match function used by Business Services. Covered Persons will sort to the top of the list. This allows Business Services staff to identify Veterans and Eligible Spouses to deliver USDOL Priority of Service for Veterans and Eligible Spouses.

- C. **Signage:** WSO centers have signage that is clearly visible (Priority of Service Poster, ES Publication 259), particularly upon entering each WSO center, to inform our customers that Priority of Service for Covered Persons is offered to Veterans and Eligible Spouses.
- D. **Contact (in-person/phone/virtual):** WSO staff are trained to ask customers *“Have you ever served in the U.S. military, or, are you the spouse of a veteran?”* WSO centers main phone greeting also promotes priority of service through the following 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.”*
- E. **Social Media Platforms and other recruitment websites:** The use of social media platforms (e.g., LinkedIn, Facebook) and other recruitment websites (e.g., Indeed) to promote WSO job postings creates new avenues for Veterans and Eligible Spouses to connect with WSO staff. When using social media platforms or other recruitment websites, the job posting will reference priority of service for Veterans and Eligible Spouses through the following statement: *“WorkSource Oregon provides Priority of Service to Covered Persons (Veterans and Eligible Spouse). If that’s you, please say so. The Jobs for Veterans Act affords priority of service for Veterans and Eligible Spouses over non-covered persons for the receipt of employment, training, and placement services.”*
- F. **Informed:** WSO staff inform Veterans and Eligible Spouses 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).
- G. **Services:** WSO staff assist each veteran and eligible spouse with employment services, information about training opportunities, and applicable eligibility requirements for those programs and/or services.
- H. **Workshops:** Veterans and Eligible Spouses are eligible for priority/preference in registering for job-finding workshops. To ensure space is available, WSO staff are instructed to leave a couple of spots open or be prepared to accommodate any Covered Persons that come in unexpectedly. If a workshop is full, Veterans and Eligible Spouse are placed at the top of the wait list.

#### **WorkSource Oregon Center Roles:**

WSO staff are the primary providers of employment and training services to Covered Persons.

- A. **Resource Room:** At each WSO center’s main entrance to the lobby area, WSO 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 WSO center follows their local office plan on how to identify and track Covered Persons (e.g., intake spreadsheet). An optional table tent can be placed by the customer to indicate their status as an eligible Veteran or Eligible Spouse. This allows WSO staff and partners to easily recognize Covered Persons in the resource room to ensure services are provided as appropriate.
- B. **Conversations/contacts (in-person/phone/virtual):** New customers meet one-on-one with WSO staff to complete a customer-centered ‘Welcome’ conversation to learn about

reemployment and training programs and community support services. The Welcome conversation includes customized labor-market information and a review of the customer's iMatchSkills profile for completeness. During the Welcome conversation, and each subsequent contact, WSO staff apply the priority of service sequence of Identify, Inform, and Notify.

- C. **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.
- Business Services staff match staff-assisted job listings in the state's labor-exchange system (iMatchSkills) to locate qualified job seekers to be referred to employers.
  - Business Services staff must notify Veterans and Eligible Spouses of new staff-assisted job listings when the Veterans or Eligible Spouses iMatchSkills profile job preference locations and occupational experience align with the staff-assisted job listings, regardless of the quality of their iMatchSkills profile. This affords the Veteran or Eligible Spouse the opportunity to update their iMatchSkills profile to be considered for referral to the employer and potential job placement.
  - Staff-assisted job listing notifications to Veterans and Eligible Spouses are sent by e-mail, mail, phone call, or text message. Business Services staff documents the notification method and how many Covered Persons were notified in the job listing tracking notes. For example, "*Sent job notifications by e-mail to 20 Veterans & Eligible Spouses. Covered Persons file search completed.*"
  - Through iMatchSkills, employers can self-match their job listing to potentially qualified job seekers. Veterans and Eligible Spouses are displayed before non-covered persons. Job seekers can also use their iMatchSkills profile to match to job listings.
  - Local Veterans' Employment Representative use outreach to employers, and current business connections, to assist the Business Services staff in placing Veterans and Eligible Spouses into employment.
- D. **Outreach to Employers/Business Relations:** Business Services staff and Local Veterans' Employment Representatives (LVER) are responsible for promoting Veterans and Eligible Spouses as a viable candidate pool through outreach to businesses, workforce boards, chamber of commerce events, industry associations, and other venues.
- LVERs incorporate a briefing on how the WSO centers provide priority of service to Veterans and Eligible Spouses when conducting seminars for employers, and during one-on-one visits with employers to discuss veterans' recruitment strategies, and other related programs.
  - Business Services staff inform employers about how they apply priority of service for Veterans and Eligible Spouses during the recruitment processes.
  - A tracking note is placed in the business's iMatchSkills to record any Priority of Service conversations or briefings.

**Work Ready Veterans and Eligible Spouses:** WSO staff connect work ready Veterans and Eligible Spouses with WSO Business Services staff for job placement services. This referral does not replace case management services provided by DVOP staff.

(B) Describe how the State will monitor priority of service provisions for veterans.

### Monitoring of Priority of Service

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.” The WSO center managers, LVER, Consolidated DVOP/LVER, Jobs for Veterans’ State Grant Coordinator will monitor Priority of Service for Covered Persons. USDOL-VETS will review how Priority of Service for Covered Persons is applied during Jobs for Veterans’ State Grant technical assistance visits and audits.

The LVER and Consolidated DVOP/LVER staff submit to U.S. DOL a quarterly “Managers Report on Services to Veterans.” The report includes a section about compliance with Priority of Service requirements established at 38 U.S.C. § 4215 and 20 C.F.R., Part 1010. Any priority of service issues, to include resolution of prior issues, are included in the report.

The programs in the report include but are not limited to:

- WIOA Adult
- WIOA Dislocated Worker
- WIOA Youth
- National Dislocated Worker Grants (NDWG)
- Wagner-Peyser State Grants
- TAA for Workers program
- Senior Community Service Employment 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

WSO centers have “Local Office Plan of Service for Veterans and Covered Persons” which are reviewed by Managers and JVSG staff each year. The LVER, Consolidated DVOP/LVER, Jobs for Veterans’ State Grant Coordinator, Oregon Employment Department Training Team, and USDOL-VETS provide technical assistance when requested or needed.

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

The Oregon Employment Department (OED) Training Unit provides training for staff in WorkSource Oregon Centers to ensure new and existing staff have the knowledge and resources to professionally serve Covered Persons. Priority of Service for Covered Persons training covers federal guidance (TEGL 10-09), local office procedures, how to identify Covered Persons at point of entry, how to inform Covered Persons of programs and applicable eligibility

requirements for those programs and/or services, and how to notify appropriate WSO staff that a veteran or eligible spouse is in need of services, to include when to refer eligible Veterans and Eligible Spouses with significant barriers to employment (SBE) to DVOP employment services is key for successful implementation.

WSO staff access Priority of Service for Covered Persons training through Workday Learning. Workday Learning is Oregon's interactive training site for WSO staff. In addition, staff can view National Veterans Training Institute webinar entitled "Priority of Service for Grantees" to strengthen their understanding. Oregon Employment Department's website has Priority of Service for Covered Persons information that the public can view.

LWDBs, Management, OED Training Unit, are responsible to ensure ongoing training to WSO staff and partners in local centers. The JVSG program Coordinator, Local Veterans' Employment Representatives (LVER), Consolidated DVOP/LVER will be subject matter experts, along with Oregon DVET/ADVET. The Disabled Veterans' Outreach Program Specialists (DVOP) will provide support to answer staff questions when Management, OED Training Unit, LVERs, and Consolidated DVOP/LVER, are not available to answer staff questions.

(C) Describe the triage and referral process for eligible veterans and other populations determined eligible to receive services from the Jobs for Veterans State Grants (JVSG) program's Disabled Veterans' Outreach Program (DVOP) specialist/Consolidated Position.

#### Triage and Referral process for Eligible Veterans

WSO center staff performs eligibility assessments during the initial or subsequent conversations with job seekers to determine which employment and training programs to refer job seekers to. WSO staff use these assessment tools to determine a job seekers eligibility for DVOP employment services:

- WSO staff can view a DVOP-Eligible Banner displayed on the job seeker iMatchSkills profile. This banner is activated by the customer's self-attested registration responses.
- WSO staff display a one-page list of Significant Barriers to Employment (SBE) that eligible veterans and other eligible populations can indicate "yes" or "no" that they are experiencing one condition on the list.
- WSO staff have access to a "Local Plan of Service to Veterans and Covered Persons" if more information is needed to make an appropriate referral for DVOP employment services.

When the eligible veteran/eligible person self discloses through customer registration or during interaction with WSO staff that they have a SBE or meet other populations that qualifies them for DVOP employment services, the WSO staff will promote the specialized DVOP employment services.

Before an eligible veteran/eligible person with SBE are referred to a DVOP Specialist or Consolidated DVOP/LVER staff, WSO staff will use the iMatchSkills (or newer MIS) to record

the job seeker service “Referral to DVOP for Veteran’s Services” and document their conversation in a tracking note. WSO staff can facilitate a warm hand off in-person, via phone, e-mail, or Microsoft Teams message to DVOP or Consolidated DVOP/LVER staff. Some WSO centers have processes in place where the WSO staff can schedule an appointment date/time for the eligible veteran/eligible person with SBE to meet with the DVOP or Consolidated DVOP/LVER staff.

- (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.) regarding 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.

#### Accessibility for Individuals with Disabilities

Local managers work with their local Equal Opportunity Officer (EEO) — each local workforce board has an EO Officer assigned, as required by WIOA — to monitor facilities for ADA compliance as part of the Annual Compliance Review. These on-site compliance reviews 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. (A physical review of each facility may be done in collaboration with HECC and other state agencies as appropriate.) The state Universal Access Coordinator (UAC) provides guidance to local managers to ensure compliance with ADA accessibility and receives the annual ADA compliance reports from managers. Any issues identified in the compliance reviews are formally submitted to local managers and workforce boards to address.

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.

Monitoring of local Workforce Boards is done by the Higher Education Coordinating Commission (HECC) as part of the yearly WIOA requirements as described in Oregon’s Nondiscrimination Plan. This is completed in conjunction with the local ADA compliance monitoring.

#### **OED Equity and Inclusion Office:**

OED created the Equity and Inclusion Office (EIO) in 2022. The EIO supports both the Equity and Inclusion Council (EIC) and each division of the Oregon Employment Department. The EIC

promotes and supports equity and inclusion by providing a wide range of policy recommendations to OED's Executive Team and learning opportunities to the entire Employment Department, also available to many WSO partner staff. EIO staff help to develop and implement goals for the Diversity, Equity, and Inclusion Plan as part of the Governor's expectations for all agencies. This includes such activities as helping division leadership carry out Equity and Inclusion Council recommendations approved by the OED Executive Team; provide 1:1 coaching and consultation on topics like bystander intervention, microaggressions, and best practices for inclusion; help public-facing divisions implement OED's [Equity Framework](#) for their programs and projects; conduct equity reviews of new policies and practices to make sure barriers are not being created for people trying to access WSO services; and support the language and accessibility needs of our customers.

**Policies and Procedures:**

OED's Reasonable Accommodations for Customers Policy (PO-0010) and Procedures (PR-0010) clarify the standards for making WSO services accessible and delivering services to customers in compliance with the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act of 1973, and Oregon Revised Statute 659A.142. 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 Equal Opportunity Officers and HECC to develop a plan of improvement if a workforce region is not meeting the standards for equal access.

**Staff Training:**

OED staff receives training on telephone interpretation services and the language assistance policy as part of their onboarding. Ongoing training is provided as needed to ensure staff are current on available resources and procedures for serving ELL customers. Staff are also trained in disability etiquette and how to ensure customers receive requested accommodations.

**Services to Special Populations:**

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 English Language Learners 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.

Local workforce area providers 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 and the Equity and Inclusion Officer also implement and monitor 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.

In 2018, OED assigned several staff around the state to serve as Universal Access Navigators for customers experiencing a disability or other barriers to employment. These assignments were suspended during the pandemic, as most ES staff were reassigned to assist with the processing of unemployment insurance claims. OED leadership is currently working with local workforce boards to reinstate these assignments. The purpose of Universal Access Navigators is to:

- Help educate local WSO staff regarding service delivery for customers who experience a disability or people who have encountered multiple 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.
- Remain current on local programs and services available to assist individuals with disabilities 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.
- Inform local WSO staff of assistive technology and accommodation resources available to employers hiring individuals with disabilities. This includes partnering with business services staff to conduct outreach to employers to promote these resources.
- Develop and maintain relationships with local agencies/organizations that serve people with disabilities.

### **Video Interpretation and ASL Interpretation Services:**

To better serve customers with limited English proficiency, or customers who may require ASL interpretation, WSO provides video interpretation services or in-person ASL interpretation. The COVID pandemic brought to light the importance of having virtual interpreters on hand and the practice has continued.

### **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 (OCB) is a partner in the WorkSource Oregon Centers and is working with WIOA core partner service delivery staff to increase the accessibility and delivery of services to the Blind and Low Vision community. OCB has provided training to select WSO staff across the state on disability awareness, disability etiquette and assistive and adaptive device technology.

- (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. Describe how English language learners will be made aware of the opportunity to enroll and/or co-enroll in all the core programs for which they are eligible.

To help address the Accessibility of the WSO delivery system in meeting the needs of ELLs, local-level Equal Opportunity Officers are required to monitor facilities for compliance annually. The state Universal Access Coordinator's (UAC) 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. The Oregon Employment Department's (OED) Language Access Policy, PO-0802, and Procedures, PR-0802, clarify the standards for making WSO services accessible and delivering services to customers that are English Language Learners (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 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 UAC and the Equity and Inclusion Officer also implement and monitor 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.

A variety of on-line courses on diversity are available to all staff, as well as a lending library with several titles on diversity and inclusion, and Equal Opportunity. Throughout the year, OED and partner staff can attend equity and inclusion lunch and learn activities coordinated by OED's Equity and Inclusion Council, of which the Equity and Inclusion Officer and the UAC are key members.

**Translation of State Websites:**

To assist with meaningful access, the WorkSource Oregon website ([worksourceoregon.org](http://worksourceoregon.org)) and Unemployment Insurance website ([unemployment.oregon.gov](http://unemployment.oregon.gov)) have been professionally translated into 11 languages, following the agency's Language Access Procedure and Equity Framework.

In addition, the state's Online Claim System allows for new claims to be started in Spanish, Russian, and Vietnamese in addition to English. A contract is also in place for vendors to provide telephonic interpretation services, which expands the number of languages available. These changes will help WSO staff meet the shared responsibility of serving customers seeking assistance with UI and other workforce services to facilitate their reemployment.

## **COORDINATION WITH STATE PLAN PROGRAMS**

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

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 Oregon Housing and Community Services Department. 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 TAA for Workers program, 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 Oregon Housing and Community Services Department.

## **COMMON ASSURANCES**

**V. COMMON ASSURANCES (for all core programs)**

<b>The Unified or Combined State Plan must include assurances that:</b>	
1.	The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;
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;
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;
4.	<p>(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 administering 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;</p> <p>(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;</p>
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;
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);

7.	The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;
8.	The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;
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;
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);
11.	Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and
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.

## **PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS**

## **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.

**ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES**  
**Under Title I-B**

**Adult, Dislocated Worker, and Youth Activities under Title I-B.** The Unified or Combined State Plan must include the following with respect to activities carried out under subtitle B—

(a) **General Requirements**

(1) **Regions and Local Workforce Development Areas.**

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

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
10. 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 and policy 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.

**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 were:

- 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](#).

**Subsequent Designation and Definitions:**

Oregon is reviewing and may revise its policies and procedures related to the designation of local workforce development areas. This work is ongoing, and Oregon plans to include a subsequent designation procedure and definitions for the phrases “performed successfully” and “sustained fiscal integrity.” The proposed definitions are:

Performed Successfully - Met or exceeded the negotiated levels of performance for the last two consecutive program years.

Sustained Fiscal Integrity - The Secretary of Labor has not made a formal determination that either the grant recipient or the administrative entity of the area mis-expended funds due to willful disregard of the requirements of the provision involved, gross negligence, or failure to comply with accepted standards of administration for the two-year period preceding the determination.

(C) Provide the appeals process and policy 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 and policy 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](#). Should any party wish to explore filing a grievance related to the appeals process, Oregon's Grievance Procedure Policy can be found [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.

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 publicly-accessible website (currently [www.wioainoregon.org](http://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:**

- Local Workforce Development Areas
- Local Workforce Development Board Membership
- Appointment and Certification of Local Workforce Development Boards
- Conflict of Interest
- Memorandum of Understanding and Cost Sharing
- One-Stop Operator Procurement
- One-Stop Certification
- Eligible Training Provider List
- Access to Layoff Aversion Assistance

- Financial Management and Administrative Standards
- Incumbent Worker Training

(B) Describe how the State intends to use Governor's set aside funding for mandatory and discretionary activities, including how the State will conduct evaluations of Title I Adult, Dislocated Worker, and Youth activities.

Oregon Governor's set aside is in place to assist local boards in providing pre-layoff services, and for enrolled services for smaller layoffs that don't meet the threshold of a National Dislocated Worker Grant (NDWG). Funds are also available for local boards to initiate immediate services while awaiting award of an NDWG, and for a variety of layoff aversion activities and projects.

The State holds back funds specifically to provide layoff aversion, rapid response activities, and additional assistance to LWDBs, in addition to other allowable activities. Oregon is currently developing a policy to more thoroughly address the Governor's reserve funds and will provide a copy to DOL via a future State Plan modification when the policy is completed. Language within the policy also allows for flexibility in the analysis and award of any set aside funds to implement services that provide the best combinations of activities to meet the needs of local boards, and program participants.

The Workforce Talent and Development Board (WTDB) Continuous Improvement Committee (CIC) is charged with assessing the effectiveness of Oregon's public workforce development system, or WorkSource Oregon. The purpose of the CIC is to:

- Complete a continuous improvement assessment of WorkSource Oregon every even-numbered year.
- Ensure that the assessment is jointly supported and participated in by all WorkSource Oregon partners.
- Consult with Local One-Stop Operators and align assessments with center certification requirements and State monitoring efforts.

A [Governance Assessment Report](#) was approved by the WTDB in December 2022 and was forwarded to the Governor and legislature. The CIC is planning the next Assessment to be completed in 2024.

The WTDB anticipates two new reports coming in the next Program Year. The first is the 2024 Talent Assessment. This will be the fourth in a series of biannual Talent Assessments. The second is the Self-Sufficiency Standard for Oregon 2023 which is a report produced every three years in partnership with Worksystems (local workforce development board for Washington and

Multnomah counties and the City of Portland). Both reports can be found on the [WTDB's Data and Reports](#) webpage.

Finally, the WTDB will be establishing a policy workgroup in 2024 to facilitate collaboration, transparency, and accountability for system and governance policies affecting the workforce system. The workgroup will include WTDB, local workforce development board, and WorkSource Oregon representatives and policy subject matter experts.

- (C) 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.

In October 2023, Oregon designated each of its nine LWDBs as the entity responsible for carrying out rapid response in their respective local area, and HECC-OWI provides reporting requirements on the provision of rapid response services. LWDBs set policy for the portion of the statewide workforce development system within the local area, and rapid response is carried out in conjunction with the LWDB and chief elected officials. HECC provides base funding to each LWDB to fund Rapid Response-related activities and Oregon's Rapid Response Activities and Reporting Requirements can be found [here](#).

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. In addition, 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. An example of the guidance created by Oregon can be found in the Access to Layoff Assistance policy, located [here](#).

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.

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.

- (D) Describe the State policies and procedures to provide Rapid Responses in cases of natural disasters including coordination with FEMA and other entities.

Oregon's Rapid Response Activities and Reporting Requirements policy, found [here](#), designates the Local Workforce Development Board (LWDB) as the entity responsible for carrying out rapid response in the local area and instructs Local Area Rapid Response Coordinators to initiate contact with employers upon announcement or notification of a closure, a mass layoff, a mass job dislocation resulting from a natural or other disaster, or the filing of a Trade Adjustment Assistance (TAA) petition.

Oregon does not have a natural disaster-specific policy, but would coordinate with FEMA or other entities regarding natural disasters as the situation demanded. Oregon does apply for NDWGs to address disasters on behalf of our local boards who coordinate services with FEMA and other entities at their level as needed to ensure non-duplication of services.

- (E) Describe how the State provides early intervention (e.g., Rapid Response) and ensures the provision of appropriate career services to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed. (Section 134(a)(2)(A) and TAA Section 221(a)(2)(A) .) This description must include how the State disseminates benefit information to provide 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 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 and how the state will ensure the provision of appropriate career service to workers in the groups identified in the petition (TAA Sec. 221(a)(2)(A)).

One of Oregon's Combined State Plan's Oregon strategies is Rapid Response and includes: Rapid Response activities ensure statewide that workers being laid off, trade-affected workers,

and potential trade-affected workers are engaged at a WorkSource center with WIOA basic and individualized career services as well program enrollment and co-enrollment to maximize resources available to dislocated workers.

The state's Rapid Response Activities and Reporting Requirements policy provides direction to the local boards to provide a Rapid Response Information session, and the state leaves the options for providing early intervention and ensuring the provision of appropriate career services to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed to the local workforce development boards.

The state expects Local Area Rapid Response Coordinators to ensure that Rapid Response Information Session (RRIS) agendas include all required information.

Rapid Response Information Sessions (RRIS) must be coordinated by Local Area Rapid Response Coordinators. Local Area Rapid Response Coordinators must ensure that agendas include all required information and must also ensure that if the worksite is union-represented, union representatives are involved in the coordination of the information sessions and are afforded a slot on the agenda.

Local Workforce Development Boards (LWDB) in Oregon have been designated as the entity responsible for carrying out rapid response activities in the local area. The State provides LWDBs with base funding to support Rapid Response Activities and reserves additional funding which may be distributed to support unexpected rapid response, layoff aversion, or related needs.

The TAA for Workers Program provides a TAA Navigator staff to each local area with the expectation the Local Rapid Response Coordinator will include the TAA Navigator in the Rapid Response to provide 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 dislocated worker applying for them.

(b) **Adult and Dislocated Worker 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 OJT-related 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., outreach to sponsors and prospective sponsors, identifying potential participants and connecting them to apprenticeship opportunities).

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. The Oregon Employment Department (OED) continues to train WorkSource Oregon train staff and workforce system partners on the basics of registered apprenticeship. Registered apprenticeship training is 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 online tools available to assist a job seeking customer in navigating and understanding the registered apprenticeship system. Apprenticeship connections in WorkSource Centers are primarily focused on how to connect job seekers to registered apprenticeship programs. The training also addresses how to coach a customer with barriers to employment to access pre-apprenticeship or other preparatory programs.

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 and maintain the website [www.oregonapprenticeship.org](http://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 21st century workforce solution.

- (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 for the Adult Priority of Service requirement in WIOA section 134 (c)(3)(E) that requires American Job Center staff, when using WIOA Adult program funds to provide individualized career services and training services, to give priority of service to recipients of public assistance, low-income individuals, and individuals who are basic skills deficient (including English language learners).

Oregon's policy on Priority of Service for the WIOA Adult program can be found [here](#). Oregon requires Local Workforce Development Boards (WDBs) and each partner agency to establish a policy to provide priority for individualized career services and training services to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient and veterans, and to monitor for compliance. Local WDBs must establish practices that support Oregon's priorities as identified by the Governor and the Oregon Workforce Talent and Development Board (WTDB). Components of this policy are incorporated in Oregon's WIOA Title I monitoring guidance and procedures to ensure adherence to this state policy. Additionally, Oregon uses data and information from state-level reports and DOL-furnished Quarterly Report Analysis (QRA) to monitor the percentage of WIOA Adult program participants who meet Priority of Service criteria.

(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:
  - 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;
  - The labor market conditions contributing to the need for the transfer;
  - A discussion of the local area's past history of the request for transfers and how previous transfers impacted participants and funds;
  - 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; and
  - Current cash draws versus year-to-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 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.

(6) Describe the State's policy on WIOA and TAA co-enrollment and whether and how often this policy is disseminated to the local workforce development boards and required one-stop partners Trade Act Sec. 239(f), Sec. 235, 20 CFR 618.325, 20 CFR 618.824(a)(3)(i).

Oregon abides by the TAA Final Rule 20 CFR 618.325(a)(1): "A State must co-enroll trade-affected workers who are eligible for WIOA's dislocated worker program. Workers may choose to decline co-enrollment in WIOA. A State cannot deny such a worker benefits or services under the TAA Program solely for declining co-enrollment in WIOA."

At this time there is no state policy on WIOA dislocated worker program and TAA co-enrollment, therefore no policy is currently being disseminated to the local workforce development boards and required one-stop partners.

In FY23 the state received a DOL finding on Title I Dislocated Worker and TAA co-enrollment. The co-enrollment performance measure is set at 75% and Oregon did not meet the measure. In response to DOL on the finding the state submitted the following elements regarding co-enrollment policy as action items:

- HECC/OWI Deputy Director will work with TAA Program Leadership on common service tracking and common-exit policies and processes between Title I DW and TAA programs.
- HECC/OWI Deputy Director and TAA Program Leadership will continue to meet to verify system data mapping and performance reporting needs in MIS systems. This work will start off as an interim fix and continue in the state's modernization efforts slated to be completed by 2025. That more comprehensive modernization effort will address the system needs to facilitate required co-enrollment.

Oregon's state-level Workforce and Talent Development Board (WTDB) is reviewing co-enrollment language with the intent of developing a statewide co-enrollment policy.

(7) Describe the State's formal strategy to ensure that WIOA and TAA co-enrolled participants receive necessary funded benefits and services. Trade Act Sec. 239(f), Sec. 235, 20 CFR 618.816(c)

One of the strategies described in this State Plan is Integrated Service Delivery: Oregon's Integrated Service Delivery strategy creates an environment for WorkSource staff to perform as an integrated system of partners that share common goals with services delivered for a seamless customer experience to address the training and employment needs of our common customers - job seekers and businesses. Integrated Service delivery utilizes co-enrollment as a tool to reduce duplicative and administrative activities in favor of a positive customer experience. Co-enrollment is the process of determining eligibility for, and enrollment into, two or more WorkSource programs. Co-enrollment is designed for staff from multiple programs such as WIOA Title I Youth, Adults and Dislocated Workers, Trade Affected Workers, Migrant and Seasonal Farmworkers, Veterans, and WIOA Title III Employment Services to serve customers seamlessly, improving the customer experience and outcomes. Co-enrollment is a strategy for staff funded by these programs to share responsibilities for serving customers and work in partnership so that more Oregon employers are provided workers with the skills they request, and more Oregonians are getting jobs, keeping jobs, and getting better wages.

The Office of Workforce Investments believes that TAA and local WIOA Title I staff should work together to co-case manage co-enrolled participants. While either program may conduct an initial assessment of a participant's training and employment-related needs, these assessments should be available to the partner program. Co-case management is intended to ensure that participants receive all necessary funded benefits and services while limiting any duplication of services/efforts.

- (8) Describe the State's process for familiarizing one-stop staff with the TAA program. 20 CFR 618.804(j), 20 CFR 618.305

The TAA for Workers Program provides a TAA Navigator staff to each local area to and each local workforce board determines how the TAA Navigator familiarizes one-stop staff with the TAA program.

All new staff in our American Job Centers (AJC) complete a new staff orientation that includes overviews of all partners and programs administered within each local AJC.

- (c) **Youth Program Requirements.** With respect to youth workforce investment activities authorized in section 129 of WIOA, States should describe their strategies that will support the implementation of youth activities under WIOA. State's must-

- (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.<sup>8</sup> Further, include a description of how the State assists local areas in determining whether to contract for services or to provide some or all of the program elements directly.

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 postsecondary transition and retention. Oregon aims to increase the number of individuals that obtain a postsecondary education.

Oregon currently has a Governor's Executive Order in place that essentially requires all LWDBs to contract for all services and prohibits LWDBs from direct service provision, except under specific conditions (lack of service providers, piloting, or "testing" new service design, etc.). 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.

Oregon invests WIOA funds in programs that provide a continuum of services to support the diverse needs of youth and young adults. Programs should utilize career pathways and work-based learning models that align with the participants chosen career path. Local boards should align investments with their sector strategies where appropriate. Local boards should select providers that demonstrate alignment with the education, workforce, and human service systems to provide a holistic approach to serving youth and young adults.

Local boards should assess the provider's experience/ability in the following areas:

- Managing contracts and serving the target population
- Meeting reporting deadlines
- Meeting performance requirements
- Complying with state and federal requirements

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<sup>8</sup> Sec. 102(b)(2)(D)(i)(V)

Local boards should also take into consideration past performance of providers they may have selected in previous years. If, during the course of the contract period, the provider is not meeting the criteria, the local board must intervene and provide the necessary training and technical assistance.

- (2) Explain how the State assists local workforce boards in achieving equitable results for out-of-school and in-school youth. Describe promising practices or partnership models that local areas are implementing and the state's role in supporting and scaling those models within the state for both in-school and out-of-school youth.

At the State level, Oregon's Higher Education Coordinating Commission's Office of Workforce Investments (OWI) administers and coordinates a variety of youth-based programs, both WIOA and non-WIOA, that help support both in-school youth (ISY) and out-of-school youth (OSY), depending on their needs and goals. These programs include:

#### [Oregon WIOA Youth Programs](#)

The Oregon WIOA Youth Program provides workforce development training opportunities to young people ages 14-24 through the Workforce Innovation and Opportunity Act (WIOA). Through WIOA, youth gain valuable work skills through a variety of job opportunities such as job shadows, internships, and summer jobs.

#### [Oregon Conservation Corps \(OCC\)](#)

Senate Bill 762 (2021) established The Oregon Conservation Corps (OCC) Program for the purposes of reducing the risk wildfire poses to communities and critical infrastructure, creating fire-adapted communities, and engaging youth and young adults in workforce training. The OCC grants funding to organizations across the state to aid in reducing wildfire risk to communities while providing workforce training to the next generation of land managers.

#### [Oregon Youth Corps \(OYC\)](#)

The Oregon Youth Conservation Corps (OYC) provides grant funding, training, and resources to youth-serving agencies across the state to create training and employment opportunities for Oregon youth.

The Summer Conservation Corps (SCC) is OYC's largest state-funded program, with the goal of funding youth work crews in each of Oregon's 36 counties.

#### **Oregon Youth Employment Program**

The HECC received \$9 million in 2021 to support the Oregon Youth Corps and implement the Oregon Youth Employment Program (OYEP). HB 2092 (2021) complemented the funding and modernized the program requirements.

The purpose of the Oregon Youth Employment Program is to provide meaningful paid work experiences – such as internships, apprenticeships, summer jobs, etc. – and workforce preparation to youth and young adults between the ages of 14 and 24.

OWI staff also works closely with Oregon’s Department of Human Services, which administers several youth-based programs including: The Temporary Assistance for Needy Families (TANF) Youth Employment Program (YEP) is run year-round to create employment experiences for eligible youth in the Job Opportunity and Basic Skills (JOBS) Program. The focus is on TANF eligible teen parents, non-parenting teens, young parents, and TANF related youth in the Child Welfare Independent Living Program and Vocational Rehabilitation Program between the ages of 16-24.

### **Department of Human Services (DHS) Youth Employment Program**

The Temporary Assistance for Needy Families (TANF) Youth Employment Program (YEP) is run year-round to create employment experiences for eligible youth in the Job Opportunity and Basic Skills (JOBS) Program. The focus is on TANF eligible teen parents, non-parenting teens, young parents, and TANF related youth in the Child Welfare Independent Living Program and Vocational Rehabilitation Program between the ages of 16-24.

This program provides cash assistance to low-income families with children while they strive to become self-sufficient. Cash assistance is intended to meet a family's basic needs such as food, clothing, shelter and utilities. The Jobs Opportunity and Basic Skills (JOBS) program is the state's employment and training program for low-income families on TANF. The JOBS program provides job search, work experience, employment, high school and GED completion, life skills, and other services to parents in the JOBS program. The TANF Youth Employment Program (YEP) is intended to be a year-round program providing employment experiences for youth in the JOBS Program. The focus of the YEP is on eligible teen parents, non-parenting teens, young parents, and TANF related youth in the Child Welfare Independent Living Program and Vocational Rehabilitation Program between the ages of 16- 24. Oregon DHS administers these programs.

Existing HECC contracts with local workforce development boards (WDBs) provided WIOA Title I funds for youth services closely aligned with YEP services. Local WDBs also receive additional youth services funding from a variety of sources. These aligned, combined, and leveraged funds provide better outcomes for youth.

In addition to regular state-local meetings focused on WIOA Title I youth, OWI has established a youth services “Community of Practice” with brings together state and local program managers, practitioners, and others from the programs listed above to share successes and challenges, develop cross-program service strategies for youth, and minimize duplication of effort. This Community of Practice model has been well-received and successful and has become a recognized best practice and model for other cross-program collaborative efforts.

Due to a variety of influencing factors – including Oregon’s diverse urban and rural communities, the specific needs of local workforce areas, and lingering aftereffects from the COVID pandemic disruptions to schooling/educational institutions – Oregon is pursuing a waiver to reduce the federally-required minimum expenditures for OSY, with the intent of supporting more ISY in some local areas.

- (3) Describe how the State assists local workforce boards in implementing innovative models for delivering youth workforce investment activities, including effective ways local workforce boards can make available the 14 program elements described in WIOA section 129(c)(2); and explain how local areas can ensure work experience, including quality pre-apprenticeship and registered apprenticeship, is prioritized as a key element within a broader career pathways strategy.

As described previously, the Office of Workforce Investments has established a youth services “Community of Practice” with brings together state and local program managers, practitioners, and others from youth-oriented programs to share successes and challenges, develop cross-program service strategies for youth, and minimize duplication of effort. This Community of Practice workgroup meets regularly and is facilitated by two State staff representing both WIOA and non-WIOA youth programs and initiatives.

To ensure that the 14 program elements are effectively implemented, the state will review program performance on an annual basis. Through analysis and recommendations, program improvement processes may be developed as needed. Local plans must include local board actions to become or remain a high-performing board. The factors that will be used to determine this include effectiveness and continuous improvement.

The state also ensures 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.

Oregon invests in apprenticeship modernization through the collaborative efforts of the Higher Education Coordinating Commission, Office of Workforce Investments, the Bureau of Labor and Industries, and other state and federal funding partners in alignment with recommendations sent to Oregon’s Governor’s Office by the Office of Workforce Investments (OWI) that can help inform a student’s path with transferable skills that give them a lifelong set of opportunities, including high-demand Essential Employability Skills. This work includes investment in the development of registered youth apprenticeships. Registered apprenticeships for youth transform how the nation’s education system prepares young people to enter careers and launches them into a successful adulthood through mutually beneficial partnerships across schools, industry, and communities. These partnerships create opportunities for youth

apprentices to finish high school, start their postsecondary education at little-to-no cost, gain paid work experience alongside a mentor, and start along a path that broadens their options for the future. For employers, youth apprenticeship is a cost-effective talent strategy, as apprentices build skills to meet ever evolving business needs and develop into valued contributors to the profitability of the employers.

- (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.

Oregon currently has no State policy on this topic. 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 these criteria in their OSY or ISY eligibility must create a policy that is adopted by the local board and 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 disbursement 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).)
- (4) A description of the roles and resource contributions of the one-stop partners.
- (5) The competitive process used to award the subgrants and contracts for title I activities.
- (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.
- (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.
- (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.

All answers in (d) are “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 most recent data available regarding the results and outcomes observed through implementation of the existing waiver, in cases where the State seeks renewal of a previously approved waiver.

At the time of this writing, Oregon has no "concrete" plans to apply for any waivers during the time covered by this State Plan. In the event that Oregon does apply for a waiver for PY 2024 or beyond, the State will address the process via a plan modification.

**TITLE I-B ASSURANCES**

<b>The State Plan must include assurances that:</b>	
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;
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;
3.	The State has established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;
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);
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;
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;
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);
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;

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;
10.	The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.
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);

**WAGNER-PEYSER ACT PROGRAM  
(Employment Service)**

## WAGNER-PEYSER ACT PROGRAM (Employment Service)

### (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 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.

Professional Development for our WorkSource Oregon Staff is a high priority for Oregon Employment Department (OED) Workforce Operations Leadership. Workforce Operations launched the WorkSource Oregon Training Team in 2018 creating 9 permanent positions. The team has evolved to meet the needs of today's customers. In 2023 we have 12 permanent positions located around the state, 7 Learning and Development Specialist 1s (LDS1s) who provide staff development in centers by region, and 5 Learning and Development Specialist 2s (LDS2s) who focus on instructional design and programs and systems training to keep up with the constant demands of change.

The purpose of the WorkSource Oregon Training Team – now called the Learning and Development Team – is to ensure staff receive up-to-date onboarding and ongoing training for our 36 WorkSource centers to support staff in doing their best work in serving our customers. Our approach to staff development is to one of lifelong learning and continuous improvement. We use multiple modalities from individual coaching to in person and virtual training, self-paced eLearning, blended learning, video, webinars, etc. We seek to provide a broad range of engaging staff development opportunities to support staff in staying current, upskilling, and excelling in their roles.

Beginning in 2024 we are implementing the Business Partner model for LDS1s serving their local centers. The Learning and Development team is stationed in WorkSource centers across the state where they can provide individualized coaching of staff and design trainings to meet the needs of that area. The trainers meet with local leadership to assess needs monthly and then engage in staff development training and activities in the centers. They also provide in-center support for major projects and initiatives including Frances UI training, Able Bodied Adults Without Dependents (ABAWD) training, Work Ready, and Taking Services Training. LDS1s also work closely with office leadworkers and support new center staff including

Reemployment Services and Eligibility Assessment (RESEA, the federal claimant reemployment program) support.

Within WorkSource Oregon, our core curriculum consists of:

**A Division Orientation** to support division culture and support staff retention.

**101 Series:** An 8-week WSO New Hire Training series to successfully launch new center staff into their new careers. For new hires but open to all staff. Example topics include:

- Priority of Service
- WorkSource Oregon Standards
- Career Coaching (4-part series)
- Welcome Conversation (one-on-one meeting with new/returning customers) (2-part series)
- WorkSource Oregon Management Information System Basics (3-part series)
- Universal Access
- Meet the Federal and State Workforce Programs (11-part series)
- Supporting a Diverse Workforce
- Reemployment Services and Eligibility Assessment (3-part series)
- Job Seeker Workshops (5-part series)
- Working with Difficult Customers
- SNAP Training and Employment Program (2-part series)
- Resume and Interview Coaching (4-part series)

**201 Series: Staff Development (open to all OED and WSO staff, those topics that apply are open to partner staff)**

- WorkSource Oregon Management Information Systems basics for partners
- Able Bodied Adults Without Dependents
- Handling Complaints
- De-escalation Techniques
- Referrals and Recommendations
- Dependable Strengths
- Trauma Informed Care (open to partners)
- Job Listing Writing
- Motivational interviewing
- Arbinger: Outward Mindset (open to other divisions)
- Human Trafficking Awareness training (open to other divisions and partners)
- SNAP Training and Employment Program Refresher
- Data Literacy workshops

Current initiatives underway include developing the new WorkSource Oregon Standards training in collaboration with WorkSource Partners. These 2-day workshops will be delivered to all WSO staff and partners in person by region in 2024. These workshops will serve to foster relationships and understanding among those who provide wraparound services for our common customer.

Currently under development is a series of three “Services Transformed” training programs:

1. *Services Transformed for front line staff.* The focus is on reviewing staff-assisted services and their importance in case management and tracking outcomes. This course, launched in 2023, has increased the number of services taken and accurately recorded by WorkSource staff by 37%.
2. *Services Transformed for employees serving customers under the Supplemental Nutrition Assistance Program (SNAP) Training and Employment program.* The focus is on reemployment and training services and excellence in customer service.
3. *Services Transformed for Business Services staff.* This course will be in development in 2024. The goal is to improve service delivery and program outcomes by enhancing the relationship between Business Services staff and our Career Exploratory team members to reduce the time an unemployment insurance claimant spends looking for work. Another goal is to improve employer outreach and relationships.

In early 2024 WSO staff received training on the new unemployment insurance (UI) system, Frances. Training included assisting UI customers in WSO centers with navigating Frances to file initial and continued claims.

The Workforce Operations Division has a priority of using data to inform decisions. Learning and Development is partnering with OED’s Research Division to roll out a series of data literacy trainings at every level of the division. The goal is to increase staff’s comfort level in reading, interpreting, and using data to manage programs and inform work efforts. Data literacy trainings will continue through 2027.

Oregon’s governor has a statewide initiative of raising awareness of human trafficking. We know statistically that we are seeing customers in WorkSource centers who are being trafficked. As a result, we collaborated with the Department of Justice to put all our field staff and leadership through Human Trafficking Training to raise awareness, dispel myths and learn about local resources and partners. This started in 2023 and will continue with new hires each year. These trainings are available to other division staff and partners are also invited.

- (3) Describe strategies developed to support training and awareness across core programs and the Unemployment Insurance (UI) program and the training provided for Employment Service 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. Following the pandemic, the WSO/UI Connectivity workgroup assisted in developing the UI Levels of Service which now guides the work that WSO staff carry out for claimants. This initiative was intended to take the pre-pandemic list of services provided and include some of the knowledge obtained and developed during the pandemic to create a more customer service-oriented environment. This initiative included development of training that is now part of the onboarding process for ES staff. Program coordinators from RESEA and STEP/ABAWD now provide monthly webinars to discuss relevant topics, answer questions, and provide opportunity to connect with both ES and UI staff.

This work is coordinated with OED's training team (a dedicated team that supports and trains WSO staff in the delivery of workforce services) 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.

A work search assessment is completed for each claimant attending a Reemployment Services and Eligibility Assessment (RESEA) conversation or subsequent RESEA interview (all unattached claimants are required to participate in the RESEA program as a condition of UI benefit eligibility). The purpose of the work search assessment is to review the claimant's reported work search activities for compliance with UI requirements. When potential issues are detected, they are sent to UI for review. Potential issues detected by staff outside of an RESEA conversation or subsequent RESEA interview are also sent to UI for review.

(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*

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.

An updated WorkSource Oregon website ([www.worksourceoregon.org](http://www.worksourceoregon.org)) makes it easier for claimants to find relevant information about how to file a claim and find a local WorkSource center. Claimants who choose to visit a WSO center in-person can do so without an appointment, while those seeking a virtual meeting can schedule it using an online scheduling tool. The website also features a new video that explains the process in under 5 minutes and sets expectations for the period of time immediately following the initial claim filing.

To assist with meaningful access, the WorkSource Oregon website ([www.worksourceoregon.org](http://www.worksourceoregon.org)) and Unemployment Insurance website (<https://unemployment.oregon.gov>) have been professionally translated into 11 languages, following the agency's Language Access Procedure and Equity Framework. In addition, the state's Online Claim System allows for new claims to be started in Spanish, Russian, and Vietnamese in addition to English. WorkSource Oregon centers also employ a high number of bilingual employees and are trained in working with customers with disabilities to ensure that they receive equitable access to our services. Staff also have access to telephone and video interpreters and contract interpreters as needed to assist customers.

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

*Strategy for Providing Reemployment Assistance to UI Claimants*

Recognizing the importance of the Reemployment Services and Eligibility Assessment (RESEA) program in connecting claimants – particularly those from underserved population groups, including those facing barriers to employment such as low-income individuals, English language learners, individuals without housing, and individuals with disabilities – with reemployment services and its impact in shortening the duration of UI claims, the Oregon RESEA program continues to require that all unattached claimants participate in RESEA. Prior to 2021 only those identified as most likely to exhaust benefits were selected. This change has allowed the state to serve a significantly larger and more diverse pool of customers.

The initial RESEA interview, in accordance with USDOL guidelines, is conducted one-on-one, either in-person or through video conferencing. Those identified as most likely to exhaust benefits are selected for a subsequent RESEA interview.

The RESEA interview focuses on assessing the claimant's job-finding needs; providing just-in time reemployment services; the provision of customized labor market and career information; connecting them to other workforce services and programs as appropriate, such as the

Supplemental Nutrition Assistance Training and Employment program, Jobs for Veterans State Grants program, and WIOA Title I Adult and Dislocated Worker programs; developing a reemployment plan; and conducting an assessment of UI benefit eligibility to include a review of the two most recent weeks of reported work search activities. Potential issues detected are referred to UI for adjudication.

Customers selected for RESEA have the option of an in-person appointment or scheduling a virtual appointment with a set date and time with staff. Customers may schedule virtual appointments online through the WorkSource Oregon website or by contacting a center directly. Scheduling an appointment is not required as drop-in customers continue to be served, but is a tool to be used when it works best for the customer.

Oregon has begun the process of evaluating the RESEA process per USDOL requirements. In 2023 OED started the procurement process of an Intergovernmental Agreement (IGA) with a public university and, once executed, this agreement will allow Oregon to begin designing an evaluation that will likely include significant changes to the RESEA process. While the evaluation will include analysis of current elements of the RESEA process, changes will likely be required to satisfy the requirements of USDOL. Currently a draft framework calls for replacing the subsequent RESEA interview, which has some elements repeated from the initial interview, with a more customer centric 'Coaching Session' in which staff will focus on the claimant's job seeking strategies, resume support, and next steps and referrals to job or services.

#### *Strategy for Providing Reemployment Assistance to Other Individuals (non-Claimants)*

New and returning customers are offered a one-on-one appointment with staff (also known as a "Welcome Conversation"). The goal is to provide a meaningful, customer-centric experience for the customer. In the appointment, staff review, assist with, or conduct basic registration requirements; provide additional information about services related to a customer's identified goals; provide customized labor market information; refer customers to other workforce programs as relevant and necessary, such as WIOA Title I Adult and Dislocated Worker, Jobs for Veterans State Grants, and Supplemental Nutrition Assistance Training and Employment; and provide guidance on next steps based on a customer's needs, interests, and goals. During and after a one-on-one, staff are required to identify, articulate, and document a customer's next steps.

#### *WorkSource Oregon Operational Standards*

Reemployment services in the WorkSource Oregon centers are guided by the *WorkSource Oregon Operational Standards*. Developed in 2017 and updated in 2023, the Standards provide a basic level of guidance to help ensure minimum requirements are met and standardization exists around operations and service-delivery in WorkSource Oregon centers, while providing flexibility to meet local needs. The Standards also encourage sustainable efforts to annually assess, and continuously improve area standards as the economy and local needs change. Standard state guidance and local standardized processes helps ensure that everyone is working collaboratively towards the same goals. Standards also help keep staff and leadership

teams accountable and focused on improvement opportunities, while eliminating duplication and fragmented processes. A copy of the Standards can be found [here](#).

Following are several key provisions of the Standards. First, all WSO centers will offer access to staff-led Talent and Development Workshops to teach essential employability skills for work readiness including (at a minimum): Résumé Development, Basic Computer Skills, Interviewing Skills, Networking/social media, and essential employability skills. Second, all customers referred to employers as part of WSO recruitment activities will go through a process of skills validation. And third, all WSO centers will maintain a level of technology that is sufficient to ensure access for remote customers to WSO services and access for customers to WSO partner programs not physically located in the center.

(d) **Describe how the State will use Wagner-Peyser Act funds to support UI claimants, and the communication between the Employment Service 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 Act Funds to Support UI Claimants*

In Oregon, UI claimants are required by law to complete registration with the state’s employment service and attend an in–person or virtual orientation interview with Employment Services (ES) staff at one of the WSO centers. This activity is to be completed within several weeks of filing their claim. 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 be placed in suspense.

The OED, through specific federal funding, conducts Reemployment Services and Eligibility Assessment (RESEA) interviews for all unattached claimants. 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*

In Oregon, all unattached UI claimants are required by law to complete registration with the state’s employment service system (ORS 657.15 – Benefit Eligibility Conditions). To support this effort, basic demographic and contact information is passed from the UI system to the ES system when an initial claim is filed. This initiates the process for claimants to become registered in the state’s labor-exchange system (iMatchSkills). It also supports co-enrollment across core and partner programs administered through WorkSource Oregon.

Staff work with unattached claimants to gather additional information to ensure the registration reflects the type of work the claimant is seeking. 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 and Making Eligibility Assessments*

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.

#### *Providing Job Placement Services for UI Claimants*

As mentioned earlier, all unattached claimants are selected for participation in the Reemployment Services and Eligibility Assessment (RESEA) program. This program is the key component of OED's claimant reemployment strategy. Each year the program serves upwards of 50,000 plus claimants, helping them connect with critical reemployment and training services available through WorkSource Oregon and partner programs. A discussion of the RESEA program and the placement services made available to claimants through WorkSource Oregon centers, is covered in Section C. "Describe the State's strategy for providing reemployment assistance to UI claimants and other unemployed individuals."

- (4) Provision of referrals to and application assistance for training and education programs and resources.

#### *Provision of Referrals to Training Programs and Other Resources*

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 Training and Employment, Vocational Rehabilitation, and Adult and Dislocated Worker programs. Staff also demonstrate how to access labor market information and career information to make informed choices.

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.

To facilitate staff referral of claimants to workforce programs, those eligible for the SNAP Training and Employment program and the Jobs for Veterans State Grants program are identified through a flag placed on their registration in the state labor-exchange system, iMatchSkills. The system also flags customers who are potentially eligible for Trade Act benefits as affected workers.

In addition, claimants identified as Migrant and Seasonal Farmworkers through the WSO registration process, are also flagged in iMatchSkills. This facilitates the referral of customers to workforce programs dedicated to serving MSFWs such as the National Farmworkers Jobs Program.

Claimants interested in accessing WIOA Title I services are referred to the local provider, who will work with the individual to assess their occupational and career goals and potential eligibility for WIOA Adult and Dislocated Worker programs, including other programs, such as WIOA Youth. (Claimants are co-enrolled in Adult and Dislocated Worker programs when a qualifying Title I service is received.)

Of note, Oregon has a program that allows UI claimants to attend school while receiving regular UI benefits. Open to individuals who have lost their jobs and are not likely to return to their previous industries, the Training Unemployment Insurance (TUI) program removes the work search requirements while claimants attend school full time. The TUI program is designed for short-term training (including associate degrees, but not transfer degrees), or it may be used for vocational training. Information about the TUI program is shared with claimants when filing for UI benefits.

Oregon also has a program that allows claimants to engage in self-employment activities while claiming benefits. Through the Self-Employment Assistance (SEA) program, claimants keep their business proceeds in addition to their full weekly benefit payment. Work-search requirements are also waived while working full time on self-employment activities. Like the TUI program, SEA is for individuals who are not likely to return to their previous industries. Information about SEA is shared with eligible claimants when filing for UI benefits. WSO staff also promote the program to eligible claimants during the RESEA interview (eligible claimants have an SEA flag placed on their iMatchSkills registration).

- (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.
  - (1) **Assessment of Need.** Provide an assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

### Farmworker shortages and the H-2A Program

Agricultural employers continue to note that there seem to be fewer U.S. workers to help with the harvest and are increasingly utilizing the H-2A Temporary Agricultural Worker Program to meet the need for seasonal labor. Oregon Employment Department (OED) Migrant Seasonal Farmworker (MSFW) outreach staff report growers are concerned that such factors as the aging of the agricultural workforce and pending retirements; a younger generation that chooses not to follow in their parents' paths, but instead pursue higher education; and the abundance of jobs in other sectors offering competitive wages, such as manufacturing, food service, and construction are diminishing the availability of agricultural workers (of note, Oregon has one of the highest minimum wage rates in the country).

According to an article published by the U.S. Department of Agriculture, the H-2A visa program has grown rapidly in recent years as domestic workers find jobs outside agriculture and fewer newly arrived immigrants seek agriculture jobs. The report also notes that nationally, "The U.S. Department of Labor certified around 370,000 temporary jobs in fiscal year (FY) 2022 under the program, more than 7 times the number certified in 2005 and double the amount in 2016." (source: [H-2A Temporary Agriculture Job Certifications Continued to Soar in 2022](#))

One of the requirements imposed by the H-2A program is the Adverse Effect Wage Rate, which is a higher wage rate that guarantees both foreign agricultural workers and corresponding workers (domestic workers performing the same work) a wage that is higher than the Oregon minimum wage, providing an incentive to workers in agriculture. Employers are also required to give hiring preference to domestic farmworkers when supplementing their agricultural workforce through the H-2A program. One of OED's longstanding goals has been and will continue to be connecting domestic farmworkers with agricultural employers as appropriate.

More information about the H-2A program can be found at [H-2A Temporary Agricultural Program | U.S. Department of Labor \(dol.gov\)](#).

### Assessment of farmworker needs

According to the Oregon Occupational Safety and Health (Oregon OSHA) registry there are 400 registered labor housing camps in Oregon, housing an estimated 10,000 farmworkers and their family members, according to the Oregon Law Center (source: "*Oregon farmworkers say they're 'being missed' from task force on agricultural housing*" – [Statesman Journal](#)). Unfortunately, many of Oregon's migrant labor camps experience habitual issues including isolation, reduced access to services, 24-hour eviction notices, and excess heat during peak months of harvest. The department remains committed to working with Oregon Human Development Corporation (OHDC), and other advocacy and enforcement agencies, to report violations and improve housing conditions for agricultural workers.

According to Oregon Employment Department Migrant Seasonal Farmworker Outreach staff, common needs identified for farmworkers include:

- Access to training opportunities, particularly Title 1 Adult and Dislocated Worker programs, for career advancement and promotional opportunities;
- Access to reemployment and career services through Oregon's one-stop centers;
- Financial support while in training or career transition;
- Access to the internet and other technologies;
- Access to transportation, especially in rural areas;
- Access to affordable healthcare;
- English as a second language classes;
- Access to worker rights and legal services; and
- Access to safe and affordable housing.

According to the [Farmworker Needs Assessment](#) report, commissioned by OHDC and completed by Colibri Consulting in 2022, farmworker needs identified most frequently by MSFWs include:

- Employment Justice (workplace health and safety improvement, worker exploitation, discrimination and sexual harassment reduction, income and benefits improvement),
- English classes,
- Translation services,
- Information access (lack of internet and computer access), and
- Legal assistance

Other needs identified in the report include:

- Transportation,
- Utility costs,
- Affordable childcare,
- Mental health counseling,
- Access to healthy food,
- Affordable housing,
- Job training,
- Access to healthcare,
- Safety from domestic violence, and
- Education support for children

#### Housing needs remain acute

According to a 2023 study of farmworker housing, sponsored by the Oregon Housing and Community Services Department (OHCS), there are an estimated 66,269 farmworker households in Oregon, most of which need affordable housing that is not currently available. The study, titled "Cultivating Home: A Study of Farmworker Housing in Hood River, Marion, Morrow and Yamhill Counties in Oregon," is available [here](#). Key findings of the study are below; not listed, but included in the study, are recommendations for addressing these issues.

- 32% of farmworker households in Oregon and Washington live in poverty, compared to the national estimate of 14% for the general U.S. population.
- Farmworkers earn very low incomes. The average farmworker family in Oregon earns \$20,000 to \$24,999 per year, which is between 25 and 37 percent of the median family income for the general population.
- Many of the farmworkers interviewed in the study described poor housing conditions.
- Rental application requirements also prevent farmworkers from being able to access private rental housing.
- One in four farmworkers interviewed said they wanted to own their own homes but face barriers.
- Farmworkers need resources to help them find housing. Farmworkers requested information on available and affordable housing be published somewhere, or to have help from an organization or liaison to help them find and obtain housing.
- Employers face many barriers to providing farmworker housing. Employer barriers include high cost, difficulty meeting labor housing regulations, and difficulty with local permitting and zoning requirements. Employers who provide farmworker housing usually provide it for free to their workers in addition to their wages.
- Insufficient data about the number of farmworkers and their incomes makes it impossible to reliably quantify the need for farmworker housing.

#### Addressing the unique workforce needs of farmworkers

Many of the unique workforce needs of MSFWs are addressed by the Oregon Employment Department, which administers the Employment Service (ES) under title III of the Workforce Innovation and Opportunity Act (WIOA), and Oregon Human Development Corporation (OHDC), which administers the National Farmworker Jobs Program (NFJP) under WIOA section 167.

OED provides reemployment and career services, to include job-matching and connecting participants with other workforce programs offering training and supportive services such as the Supplemental Nutrition Assistance Program (SNAP) Employment and Training program, and WIOA title I Adult and Dislocated Worker programs. NFJP provides career services, training, and housing services. They also help participants acquire skills needed to obtain, retain, and advance in agricultural jobs or start new careers. OHDC, in addition to administering the NFJP, also provides housing assistance and supports farmworkers with rental and utility assistance, emergency shelter, household costs, and more.

OED operates 36 WorkSource Oregon (WSO) centers across the state, while OHDC provides NFJP career and training services in the following ten locations:

- OHDC Hood River, Hood River 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.

Through a memorandum of understanding (MOU), updated in 2023, OED and OHDC work collaboratively to improve the delivery of services and employment outcomes for MSFWs and their eligible dependents. Under this agreement, NFJP staff assist customers in the completion of a full registration in the state's labor-exchange system, iMatchSkills, to facilitate job matching and the receipt of reemployment services. NFJP staff also advise MSFWs on the Complaint System, administered by OED. Similarly, OED staff work to actively refer MSFWs to NFJP providers for career and training services to include housing assistance. And finally, OED and OHDC coordinate, whenever possible, joint outreach efforts to MSFWs in areas where they work, live and congregate. Outreach services are critical to promoting workforce services, including the Complaint System, to MSFWs and their families.

- (2) Provide an assessment of the agricultural activity in the State: 1) identify 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) Identify any economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will affect agriculture in the State.

### Top labor-intensive crops

According to the Oregon Department of Agriculture, 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.

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.

### Needs of agricultural employers

Employers struggle finding domestic workers who want to work in agriculture. To meet this demand, applications for the H-2A Foreign Labor Certification Program have increased significantly, from 47 in FY 2016, to 103 in FY 2019, to 175 in FY 2023. The OED Foreign Labor Certification program estimates that employers have requested to bring in upwards of well over 10,000 foreign workers since 2016.

*For more information on scarcity in the labor force, see Section 1, Assessment of Need.*

Employers are also required to provide H-2A foreign and corresponding domestic workers with housing when conditions of the contract are met for travel distance from their place of residence. The Oregon Occupational Safety and Health Administration (OSHA) will conduct the first housing authorization and consultation, and the State Workforce Agency (SWA) will conduct housing consultations in subsequent years as authorized. Housing consultations conducted by OED have increased significantly in recent years, from 64 in 2018 and 88 in 2019, to 235 in 2021 and 372 in 2022.

### Oregon's new agricultural overtime requirements (HB 4002)

In April 2022, then-governor Kate Brown signed into law House Bill (HB) 4002, Oregon's farmworker overtime bill. The bill requires agricultural employers to pay certain workers for overtime hours worked and creates a refundable personal or corporate income tax credit for employers for a percentage of wages paid as overtime pay to agricultural workers for calendar years 2023 through 2028. The impact of this bill on Oregon agricultural employers is not fully known. During legislative hearings in 2022, many employers expressed concern that the bill may result in reduced hours and lost wages for farmworkers and impact the number of farms able to operate in Oregon. While little is known as to the long-term impacts of similar legislation passed in other states, a report titled *Potential Impacts of Overtime Laws for U.S. Crop Workers* by Alexander E. Hill and Trenton K. Tanabe from Colorado State University, suggest that the effect of these laws will depend on how employers respond, which can be considered in two extremes to bound the potential impacts as discussed in the excerpts below. The full report can be found [here](#).

- At one extreme, employers could take actions so that all employees work below the overtime hours threshold. In this case, current workers would take a pay cut and work fewer hours. Possible mechanisms to accomplish this include adopting labor-saving technology,

reducing overall production or production of labor-intensive crops, relocating to other states or countries, or hiring more workers (Martin 2017).

- At another extreme, employers could make no changes to their operation and maintain their current workforce size and hours. In this case, workers would earn more money while employers would face higher payroll costs.

OED will monitor the impacts of HB 4002 and stands ready to assist both agricultural employers and farmworkers, as appropriate, who may be impacted by this legislation.

- (3) Provide an assessment of the unique needs of farmworkers by 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 yearround 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.

#### Approximate number of MSFWs in the state

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. Updated in 2018, this study estimates 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. The number of H-2A foreign workers has started to replace a portion of the domestic workforce on a seasonal basis, as immigration slows, and more farmworkers retire or choose to leave the industry altogether. According to a May 2021 report published by the U.S. Citizenship and Immigration Services (*H-2A Nonimmigrant Temporary Agricultural Trends Report*), in Fiscal Year 2020 there were over 1,427 H-2A workers petitioned in Oregon. According to the same report, there were 959 in FY 2018 and 1,250 in FY 2020.

In FY 2023, OED estimates that there were roughly 3,600 petitioned H-2A workers in Oregon. OED believes that this number will continue to increase annually, in addition to the reforestation H-2B workforce based predominantly in Southern Oregon.

(Note: OED was not able to obtain estimates of total MSFWs in the state during peak and low seasons.)

The Oregon Bureau of Labor and Industries (BOLI) manages the certification process of farm labor contractors, of which there are more than 1,100 licensed contractors according to an October 2022 article published in the [Statesman Journal](#).

OED outreach staff report that employers that provide good housing for their workforce often find their employees return the next season, while employers that have substandard housing for farmworkers are generally in a continuous struggle to find labor 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 (source: <https://oregonfresh.net/education/oregon-agriculture-production/oregon-nursery-industry/>). 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 produced in Oregon are the expanding vineyard industry, hops, blueberries, strawberries, apples, pears, cherries, grass-seed, onions, and hazelnuts (source: <https://www.oregonfarmbureau.org/oregon-agriculture>).

#### Characteristics of farmworkers

The following farmworker characteristics come from the [National Agricultural Workers Survey, 2019-2020](#), prepared for the U.S. Department of Labor, Employment and Training Administration, by JBS International, Inc. Below are several key findings as they relate to serving MSFWs and providing workforce services.

- Two-thirds of farmworkers said that Spanish was the language in which they were most comfortable conversing (62%), 25 percent said English was, 6 percent said both Spanish and English, 6 percent said more than one language (excludes Spanish/English bilingual), and 1 percent reported an indigenous language.
- Thirty-two percent of workers reported that they could speak English “well,” and 29 percent said, “not at all.” Thirty-one percent reported that they could read English “well” while 40 percent said, “not at all.”
- The average level of formal education completed by farmworkers was ninth grade. Four percent of farmworkers reported having no formal schooling, and 35 percent reported completing the sixth or a lower grade. Twenty-two percent of farmworkers said they completed grade 7, 8, or 9, and 26 percent said they completed grade 10, 11, or 12. Fourteen percent of farmworkers reported completing some education beyond high school.
- Farmworkers' mean and median personal incomes the previous calendar year was in the range of \$20,000 to \$24,999. Eight percent of workers earned less than \$10,000; 20 percent said they had personal incomes of \$10,000 to \$19,999, 30 percent had personal incomes of \$20,000 to \$29,999, and 32 percent reported that their total personal income was \$30,000 or more. Five percent of farmworkers reported not having worked at all during the prior calendar year.
- About 20% of families were below the poverty income level.

- Thirteen percent of farmworkers reported that they or someone in their household had received some form of benefit from a contribution-based program in the previous 2 years (contribution-based benefits include disability insurance, Unemployment Insurance, Social Security, and veterans' pay); 63 percent said someone in their household had received some form of benefit from a needs-based program in the previous 2 years (need-based benefits include financial assistance through programs such as Temporary Assistance for Needy Families, general assistance, and publicly provided housing or medical and nutritional assistance such as Medicaid, Special Supplemental Nutrition Program for Women, and Supplemental Nutrition Assistance Program).

The following farmworker characteristics are from the [Farmworker Needs Assessment](#) report, commissioned by OHDC and completed by Colibri Consulting in 2022.

- Most Farmworkers (around 92%) in Oregon and Washington are Latinx and over three quarters of them were born in Mexico.
- Among these Farmworkers, 72% don't speak English well, while just 26% of Latinx and 6% of all Oregonians don't speak English well.
- An undetermined, though notable number of Oregon Farmworkers are from Indigenous communities in Mexico or Guatemala, and many are not fluent or literate in English or Spanish. (Some studies estimate that 40% of all migrant farmworkers are Indigenous and that during harvest seasons they make up 20-30% of all Oregon farmworkers.)
- 9% of Oregon farmworkers and family members have a disability, as compared to 14% of all Oregonians.
- Most Oregonians are U.S. citizens, but less than a third of farmworkers have citizenship.
- An estimated 14% of Oregon farmworkers are undocumented — 12,000 people according to the Migration Policy Institute.

#### Indigenous languages spoken by farmworkers

While the predominant language of the Hispanic/Latino MSFW workforce is Spanish, a number of indigenous languages are also spoken by an undetermined number of farmworkers. These languages include Acateco (Akatek), Akateko, Amuzgo, Chol, Chuj, Cora, Hiuchol, Kaychiquel, Mam, Mixteco, Mixteco Alto, Mixteco Bajo, Nahuatl, Popti, Purepecha, Q'Anjobal, Q'eqchi, Quiche (K'iche), Tlapaneco, Trique, Yucatec Maya, and Zapoteco. The most frequently identified languages included: Chuj, Mam, Mixteco, Zapoteco (Marion County); Quiche; Umatilla County (Morrow County): Mam, Q'Anjobal, Quiche (Umatilla County); Chuj, Mixteco, Q'Anjobal, Q'eqchi, Quiche (Washington County). (source: [Farmworker Needs Assessment](#) report, OHDC)

The majority of WorkSource Oregon offices are staffed with at least one individual who speaks Spanish, and a few offices employ staff who speak another language, the most common being Russian and Vietnamese. If staff are not available to assist a customer in their preferred language, language line interpreters and video translation services are readily available to WSO staff.

### Farmworker complaints

Frequent farmworker complaints reported to OED include not being paid or paid incorrectly, safety conditions, inadequate housing issues, 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:
  - (1) Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices.

### Outreach activities

In October 2023, USDOL announced its annual list of significant MSFW states (the 20 states with the highest estimated year-round MSFW activity) and each state's designated significant MSFW one-stop centers (centers in which MSFWs account for ten percent or more of the annual participants or the administrator determines they must be included due to special circumstances such as an estimated large number of MSFW in the service area).

Oregon remains a significant MSFW state, with the following centers identified as significant offices:

- Albany
- Beaverton/Hillsboro
- Gresham
- Hermiston
- Klamath Falls
- McMinnville
- Medford
- Ontario
- Oregon City
- Pendleton
- Salem
- The Dalles
- Woodburn

Federal guidance mandates that significant MSFW states have full-time, year-round staff to conduct outreach duties to MSFWs. To meet this requirement, Oregon will employ 12 full-time outreach staff, all bi-lingual, stationed throughout the state. Outreach staff will spend 100 percent of their time on outreach responsibilities. As of December 2023, ten of these positions have been filled; OED anticipates filling the remaining positions by close of 2024.

The primary role of outreach staff is to conduct especially vigorous outreach to farmworkers in all service areas, including where they live, work, and gather. Outreach staff focus on educating farmworkers about workforce services and benefits available through local WSO centers and partner organizations, making quality referrals to MSFWs seeking reemployment and training services, and advocating for the Complaint System to ensure that MSFWs are aware of their legal protections. They also build relationships with workforce partners and educate them about the MSFW program through on-site visits, attending staff meetings, and making presentations. Of note, Oregon has a population of farmworkers who require information in indigenous languages to effectively learn about workforce services, and outreach staff work to ensure those language needs are met.

#### A new, more strategic outreach model

The COVID-19 pandemic and other environmental states of emergency have highlighted longstanding systemic inequities in the workforce system for marginalized and underserved communities, including MSFWs. To address these gaps, also a concern raised by the State Monitor Advocate (SMA), and better align the program with federal and state goals to examine and enhance services to customers with barriers, the state in 2023 restructured its MSFW outreach efforts through a new, more strategic business model.

Under this updated model, full-time MSFW outreach specialists now report directly to an MSFW Outreach manager rather than their local WSO center manager. The outreach manager oversees, and is responsible for, outreach staff and their activities, to include meeting federal program goals and other performance metrics as identified. The state believes this new business model and reporting structure will enhance communication, sharing of information and best practices among outreach staff; provide for more streamlined and consistent communication between outreach staff, WSO center managers and the SMA; improve the sharing of program data and outcomes with WSO center managers and other stakeholders; and enhance integration efforts with other workforce programs that provide career and training services, such as WIOA Title I Adult and Dislocated Worker, Apprenticeship, and SNAP Training and Employment (STEP), including those positioned to meet the unique workforce needs of MSFWs such as OHDC and Oregon Law Center.

#### Outreach activity for Program Years 2019 to 2022

PY 2019: 25,522 contacts

PY 2020: 34,253 contacts

PY 2021: 26,651 contacts

PY 2022: 40,836 contacts

#### Outreach goals for Program Years 2024 to 2027

The goal is to contact a majority of MSFWs in the state each program year. For PY 2024, that equates to roughly 45,000 outreach contacts. The state plans to meet or exceed that number each year through PY 2027, as resources and funding allow.

- (2) 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.

#### Training and technical assistance for MSFW outreach staff

As part of their onboarding experience, outreach staff receive instruction from the OED training team regarding WorkSource Oregon programs and services, the WSO Standards, and Workforce Innovation and Opportunity Act programs, and the Complaint System. The MSFW Outreach manager provides training on outreach services, sexual harassment, and other programs and initiatives. The State Monitor Advocate provides training on the Monitor Advocate system.

In addition, all MSFW outreach staff, as part of their onboarding, attend a series of classes that focus on the fundamentals of providing services to job seekers and employers. Below is the core curriculum, which may fluctuate based on agency priorities and strategic initiatives, information technology changes, and other factors.

#### *WSO New Hire Core Curriculum Training*

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.

#### *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).

#### *WorkSource Oregon Management Information Systems (WOMIS) Basics*

This introductory, multi-day course provides an overview of the Wagner-Peyser Employment Services program and the Workforce Innovation and Opportunity Act, and also covers confidentiality, creating a quality labor-exchange (iMatchSkills) registration for staff and employers, helping customers navigate the labor-exchange system and match to jobs, creating job listings, job matching and referral, employer outreach, and more.

### *An Introduction to QualityInfo*

This training helps staff coach job seekers in identifying labor market information to make informed decisions regarding job search, occupational training, salary ranges, occupational outlook, and more.

Technical assistance for outreach workers includes annual MSFW statewide training. This multi-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.

### Job seeker intake, registration and job placement assistance

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.

MSFWs referred to local WSO centers for job-placement assistance complete an intake process that includes registration in the state labor-exchange system (iMatchSkills) and a one-on-one meeting with staff that includes an assessment of needs, an orientation to workforce services and programs to include use of the state's electronic job board, and the provision of labor market and occupational information. Staff also provide reemployment assistance such as help with creating resumes, cover letters and interviewing. This includes assistance in applying for and filling out employment applications for positions listed with WSO. Staff also refer customers to appropriate and relevant WIOA title I partner agencies and to the local area National Farmworker Jobs Program (NFJP) for reemployment and training services as appropriate.

OED also educates agricultural employers about the responsibilities they have to workers, makes job placement services available, and provides training on accessing the Agricultural Recruitment System (ARS) that includes regular agriculture listings and H-2A job listings. This training helps staff work with employers, who increasingly need compliance support to navigate the H-2A application process which can be administratively complex. 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. In the next four years, OED expects a continued increase in the number of H2-A applications submitted by agriculture employers. This will require more frequent and coordinated field visits to the workers that will be working alongside Oregon domestic MSFWs by the SMA, MSFW outreach staff, and partner organizations. OED plans to begin conducting compliance reviews on H-2A contracts, tentatively scheduled to start in Program Year 2024.

- (3) Increasing outreach staff training and awareness across core programs including the Unemployment Insurance (UI) program and the training on identification of UI eligibility issues.

#### Increasing outreach worker training and awareness of Unemployment Insurance program

WSO staff receive specialized training in various aspects of the unemployment insurance program to assist claimants. Key training includes such topics as filing an initial unemployment insurance claim, providing a customized Reemployment Services and Eligibility Assessment program conversation (claimants required to seek work as a condition of UI benefits are directed to complete an RESEA meeting with staff), and recognizing UI eligibility issues to help prevent overpayments.

To facilitate communication between Employment Services (ES) and UI divisions and help strengthen partnerships for improved service delivery to shared customers (including MSFWs), OED established the “WorkSource Oregon and Unemployment Insurance Connectivity” workgroup. In place for over a decade, this group meets quarterly to facilitate communication about all levels of service delivery (policy to operations) affecting WorkSource Oregon or Unemployment Insurance, and recommend changes in policy, procedure, and operations to Division Directors of Workforce Operations, Workforce Innovation and Opportunity Act partners, and Unemployment Insurance, respectively, to better serve shared customers.

#### Equitable access to unemployment insurance

In 2022, OED received more than \$4.5 million in grant funding from the United States Department of Labor (DOL) to address disparities in access to unemployment insurance (UI). The purpose of the [grant](#) is to provide direct outreach to underserved communities and gather data to identify which communities need more help. Through the grant, OED has established a new business unit called Equitable Access to Unemployment Insurance. The goal is for this unit to create new materials in additional languages and formats, implement outreach programs for underserved communities, and provide one-on-one guidance services to help people with barriers to using the UI system.

- (4) Providing outreach staff professional development activities to ensure they are able to provide high quality services to both jobseekers and employers.

The following core curriculum courses are available to OED MSFW outreach staff.

#### *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*

This course highlights the benefits of the SNAP E&T program in helping customers access reemployment and training services.

### *RESEA Fundamentals*

This course covers 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.

### *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 solutions.

### *MSFW Annual Training*

An annual, statewide training for all staff involved in the MSFW program. Developed by and for staff in the MSFW program.

### *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.

### *Culture Matters: Managing Unconscious Bias*

This highly interactive half-day workshop is 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.

All OED field offices will collaborate with workforce partners and service providers to leverage training services for MSFWs. Partners 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) Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups.

#### Outreach and collaboration with other organizations

OED remains committed to conducting outreach activities to reach unknown populations of MSFWs that need to be informed of their legal protections, the Complaint System, and the services available to them through Oregon's WSO centers.

OED is also conducting outreach activities with its Section 167 partner, Oregon Human Development Corporation (OHDC), local interest groups, employer groups through employer and worker forums, and farmworker support groups as possible, and appropriate.

The State Workforce Agency (SWA) signed a Memorandum of Understanding (MOU) with Oregon Human Development Corporation (OHDC)/National Farmworker Jobs Program (NFJP) in 2023 to facilitate MSFW registrations in the state labor-exchange system (iMatchSkills) to increase access to reemployment and training services under WIOA. Under a separate data sharing agreement, NFJP staff are granted access to the state labor-exchange system for providing reemployment services such as registering and updating customer records, matching and referring customers to job listings, and accessing wage data to help determine NFJP eligibility.

The State Monitor Advocate will continue to work with business organizations, community service providers, and other workforce partners to explore opportunities for strengthening partnerships to improve outreach. Historically this type of work, which often involves presentations to partner agencies or meeting one-on-one with program staff, has been met with positive response. The Monitor Advocate looks forward to continuing this collaborative work that is critical to the success of the MSFW program.

WorkSource Oregon (WSO) staff work closely with the training resources available through the National Farmworker Jobs Program (NFJP) to make co-enrolled MSFW training and education referrals. 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 Program, Oregon 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).

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.

(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; and
- (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, with additional focus to deliver effective and equal access to the full range of workforce services. Federal regulations require that MSFWs 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 (available in English and Spanish) 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, including WIOA Title I service providers, 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.

Employment center staff are expected to refer MSFW customers to local WIOA Title-I service providers for career and training services, as appropriate to their occupational goals. This business model supports an integrated service delivery approach to serving customers. Title-I service providers work with individuals to assess their occupational and career goals and potential eligibility for WIOA Adult and Dislocated Worker programs, including other programs, such as WIOA Youth.

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 outreach staff 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 are 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 through 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. Employers 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.

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 local areas. Business services include: recruitment services, customized training, incumbent worker training, and job postings.

Business services are continually evolving and improving. At the start of 2013, WorkSource Oregon began offering an enhanced business services model to more effectively meet the workforce needs of the business community. 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 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 recruitment for 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 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.

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 Employment Specialists will also assist MSFWs in filling out applications for job listings registered in the OED labor-exchange 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.

In response to the pandemic, WSO centers closed to in-person traffic in spring 2020 and did not fully reopen to the public until summer 2021. During this period, technology enhancements and staff training were phased in to support the delivery of services in a virtual format. These include video conferencing software for use with external customers; a new WSO website that greatly improves customer access to the menu of reemployment and training services in twelve languages; an online appointment tool that allows job seekers to make virtual appointments with staff available in twelve supported languages, and automated emails to inform job seekers of their registration status and encourage customer engagement with WSO staff.

In addition, the state's Online Claim System in 2021 was expanded to allow for new claims to be started in Spanish, Russian, and Vietnamese in addition to English. A new contract was also established for vendors to provide telephonic interpretation services, which expanded the number of languages available to meet customer demand.

### Training and Employment Notice 10-23: Wagner-Peyser Act Staffing final rule

A note regarding federal Training and Employment Notice (TEN) 10-23, published November 24, 2023. This TEN announces the release of the Wagner-Peyser Act Staffing final rule. *The merit staffing final rule also strengthens the provision of services to migrant or seasonal farmworkers (MSFWs) and enhances the protections afforded by the Monitor Advocate System and the ES and Employment-Related Law Complaint System (Complaint System).* Oregon plans to implement any operational or programmatic changes to the MSFW program by January 22, 2026, which is the effective date for states to comply with the final rule.

- (B) Marketing the Complaint System to farmworkers and other farmworker advocacy groups.

Outreach staff actively promote awareness of the Complaint System to MSFWs. This includes helping MSFWs navigate the Complaint System and, whenever possible, helping to resolve complaints at the local level, often with the assistance of the SMA. All complaints are logged and reported to USDOL as provided in federal guidance. In addition, staff 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.

MSFW outreach staff 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.

#### (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 establish 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 reemployment and 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.

The SWA will also continue to work with the Oregon Occupational Safety and Health Organization (OSHA), the Oregon Health Authority, the Mexican Consulate, and the California State Monitor Advocate to address the workforce needs, including housing, health and workplace safety concerns for the MSFW population in Oregon. Of note, the SWA has active MOUs with the Mexican Consulate and the Oregon Health Authority. OED is also working to establish an MOU with the Idaho State Monitor Advocate to coordinate service delivery for MSFWs living in border communities.

WorkSource Oregon signed a four-year MOU with OHDC/NFJP in 2023. This collaboration includes their providers training alongside WSO staff in yearly training events. Their providers also attend WSO meetings to educate WSO staff on NFJP career and training services, including housing assistance available through OHDC. NFJP staff also have 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 customers are considered in their program service provisions. WSO staff currently work closely with the training resources available through the NFJP.

While MSFWs are recognized as a targeted population and receive equitable workforce services at the State Workforce Agency (SWA), further integration of the WIOA Title I services for MSFWs is an opportunity, particularly for youth. As more H-2A 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 WSO centers.

Improving access to and enrollment of MSFW customers with Title I employment and training services will remain a priority for Oregon's MSFW program in program years 2024-2027. 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 consistently 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.

i 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.

Placeholder for public comment.

(C) *Data Assessment.* Review the previous four years Wagner-Peyser Act 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 SWA has met the required MSFW Program Equity Ratio Indicators for Program Years 2019-2022. Equity was met in Referred to Jobs, Provided Workforce Services, Referred to Support Services, Career Guidance, and Job Development.

However, the SWA has continued to fall 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 response, OED leadership will continue to emphasize the importance of 1) addressing the needs of the

agriculture employer base to improve the hiring of MSFW applicants, 2) increasing outreach to MSFWs to make them aware of WorkSource Oregon job services, 3) training outreach staff in job development services, and 4) referring MSFWs to the National Farmworker Jobs Program (NFJP), which focuses on non-agriculture vocational training services.

Services provided to MSFWs

Below are service counts by category that SWA staff provided to MSFWs in Program Years PY 2021/2022 as recorded in the state’s labor-exchange system, iMatchSkills. Note: Lower service counts in PY 2021 are likely a reflection of WSO centers just beginning to reopen following COVID related closures, and ES staff returning to their normal functions following reassignment to help process unemployment insurance claims during the pandemic.

<b>Workforce Service &amp; Activity</b>	<b>PY 2021</b>	<b>PY 2022</b>
Welcome Process Completed (One-on-One Intake)	205	218
RESEA Welcome (One-on-One Intake for Claimants)	405	158
Next Steps Planning	370	612
Job Search Planning	203	452
*Job Search Workshop	16	26
Job Coaching	37	96
SNAP Employment and Training (STEP) Orientation	88	126
STEP Plan Uploaded (Individual Employment Plan)	37	58
Workforce Information Provided (LMI Information)	276	524
No. of Staff-Referrals to Job listings	172	184
**No. of Self-Referrals to Job Listings	4,278	3,519
Placements on Job Listings	94	72
**Obtained Employments	485	1,008

*\*may exclude those attending workshops sponsored by workforce partners*

*\*\*includes job seekers matched to job listings by employers (OED counts this as a form of self-referral)*

*\*\*\*count of job seekers employed 90 days after receiving a service from staff (customers may be counted more than once)*

MSFW performance compared to all individuals served by WIOA Title III Wagner-Peyser (ES) program: PY 2020 to PY 2022

	<b>PY 2020</b>	<b>PY 2020</b>	<b>PY 2021</b>	<b>PY 2021</b>	<b>PY 2022</b>	<b>PY 2022</b>
<b>Performance Metric</b>	<b>All W-P Participants</b>	<b>MSFW Participants</b>	<b>All W-P Participants</b>	<b>MSFW Participants</b>	<b>All W-P Participants</b>	<b>MSFW Participants</b>
<b>Participants Served</b>	26,692	913	86,790	2,101	64,822	1,879
<b>Employment Rate 2nd Qtr after Exit</b>	61.3%	57.3%	65.1%	63.0%	58.1%	62.1%

<b>Employment Rate 4th Qtr after Exit</b>	60.8%	55.5%	63.1%	58.0%	62.9%	60.7%
<b>Median Earnings - 2nd Qtr after Exit</b>	\$6,689	\$5,007	\$8,419	\$6,678	\$7,370	\$5,964

The lower Employment Rates 2<sup>nd</sup> quarter after Exit and 4<sup>th</sup> quarter after Exit for MSFWs as compared to statewide measures for all customers, is likely due to challenges such as lack of current and transferable skills, employment gaps, transportation, childcare, affordable and stable housing, and other factors disproportionately affecting underserved and underrepresented communities.

**Note:** This information is from the federal ETA-9169 annual Wagner-Peyser reports.

**Note:** Exit occurs when a participant has not received services from any DOL-administered program in which the participant is enrolled for at least 90 days. The methodology DOL uses for calculating the above measures can be found [here](#).

Combined Employment Rate 2<sup>nd</sup> Quarter after Exit for MSFWs served by Trade Act, WIOA Title I and WIOA Title III Wagner-Peyser Programs: PY 2019 to PY 2021

	<b>PY 2019</b>	<b>PY 2020</b>	<b>PY 2021</b>
<b>Employment Rate 2nd Qtr after Exit</b>	71.8%	71.5%	73.0%

The state is pleased to report that performance outcomes for MSFWs increased 1.2 percentage points between PY 2019 and PY 2021. The PY 2020 drop in performance was likely impacted by the pandemic, which resulted in WSO centers being closed to in-person traffic and many WIOA related programs and services scaled back as resources were shifted to help process unemployment insurance claims.

**Note:** This information is from Oregon’s Performance Information Reporting System (PRISM), which produces [information about the effectiveness of workforce system programs and services](#). The PRISM definitions and methods for calculating Employment Rate 2<sup>nd</sup> Quarter after program Exit can be found [here](#). (Note: MSFW outcomes data is not published on the PRISM website.)

**Note:** In general, performance outcomes were lower in PY 2020 as WSO centers closed to in-person traffic and some ES programs were scaled back in response to the pandemic.

MSFW participants served by WIOA Title I programs: PY 2019 to PY 2022

<b>MSFWs Served by:</b>	<b>PY 2019</b>	<b>PY 2020</b>	<b>PY 2021</b>	<b>PY 2022</b>
<b>WIOA Adult Program</b>	162	145	311	361
<b>WIOA Dislocated Worker Program</b>	109	91	195	203
<b>WIOA Youth Program</b>	8	24	32	33

The state is pleased to report that, except for Program Year 2020, MSFW participation increased year over year between Program Years 2019, 2021 and 2022 (source: [ETA-9169 Federal Reports](#)). PY 2020 participation rates in WIOA Title I programs were likely impacted by the pandemic, which resulted in WSO centers being closed to in-person traffic and many WIOA related programs and services scaled back as resources were shifted to help process unemployment insurance claims.

- (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 for Program Years 2019-2022

The state completed the planned restructuring of its MSFW outreach program, a project started in 2021. The final step in this process was the hiring of an MSFW outreach manager. Stationed in OED's central operations unit, this position will supervise and coordinate the activities of twelve full-time MSFW outreach staff, strategically located throughout the state to support MSFWs and the agricultural business community. While much remains to be done to address the workforce needs of MSFWs, the state believes this new, restructured program has positioned it to enhance service delivery and outreach to MSFWs, improve program communication with WSO centers, and further build on existing partnerships with other service provider such as OHDC to more effectively serve MSFWs and their families.

To some degree, the ability of the MSFW program to provide qualitatively equivalent and quantitatively proportionate services to MSFWs is impacted by 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.

Despite funding constraints, the following actions have been emphasized over the past four program years to bolster program outcomes: simple follow ups with MSFW clients following the initial intake and registration process, including job referrals; H-2A job listing promotion; job fairs and other recruitment activities targeting MSFWs; updated and complete MSFW registrations in the state's labor-exchange system for job-matching; and communication with agriculture employers regarding domestic MSFW referrals. The state remains committed to these actions.

In PY 2018, the SMA identified that MSFWs were not receiving assistance in getting complete registrations in the state's labor-exchange system, a violation of the Judge Richey Court Order. 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 mandate that MSFWs receive services on a quantitatively proportionate and qualitatively equivalent basis as those provided to non-MSFWs.

As a result of this reported violation, the SWA emphasized the importance of taking uniform, complete applications for each MSFW 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. The SWA is pleased to report that new processes and procedures fully implemented in PY 2020 to correct this violation have had positive results on the quality of MSFW registrations in the state's labor-exchange system, iMatchSkills.

In previous years, the SMA has noted 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. To address this concern, WSO centers will continue to look for ways to ensure that those higher paying agricultural jobs are visible and accessible to walk-in customers.

The SMA in PY 2020 identified that MSFW outreach staff were being required to conduct H-2A housing consultations, a violation of MSFW outreach regulations. Per 20 CFR 653.107 (4), MSFW significant states must have full-time, year-round outreach staff to conduct year-round outreach duties. Following a corrective action filed by the SMA, MSFW outreach staff no longer conduct H-2A housing consultations.

(E) *State Monitor Advocate.* The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

The SMA has reviewed and approved this AOP but would like to add that the progress/goals that need to be adhered to regarding services to MSFWs in Oregon during the coming four program years will hopefully not continue with ongoing complacency. Assurance that services be provided in a qualitatively equivalent and quantitatively proportionate manner need to

be prioritized without bureaucratic distractions from management. Per 20 CFR 653-111, State Workforce Agency staffing requirements:

- (A) The SMA must implement and maintain a program for staffing significant MSFW one- stop centers by providing ES staff in a manner facilitating the delivery of employment services tailored to the special needs of MSFWs.
- (B) The SMA, Regional Monitor Advocate, or the National Monitor Advocate, as part of his/her regular reviews of SWA compliance with these regulations, must monitor the extent to which the SWA has complied with its obligations under paragraph (a) of this section.
- (C) SWAs remain subject to all applicable Federal laws prohibiting discrimination and protecting equal employment opportunity.

**WAGNER-PEYSER ASSURANCES**

<b>The State Plan must include assurances that:</b>	
1.	The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time. (sec 121(e)(3));
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;
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

<p>4.</p>	<p>SWA officials:</p> <ol style="list-style-type: none"> <li>1) Initiate the discontinuation of services;</li> <li>2) Make the determination that services need to be discontinued;</li> <li>3) Make the determination to reinstate services after the services have been discontinued;</li> <li>4) Approve corrective action plans;</li> <li>5) Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days;</li> <li>6) Enter into agreements with State and Federal enforcement agencies for enforcement-agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and</li> <li>7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.</li> </ol>
<p>5.</p>	<p>The SWA has established and maintains a self-appraisal system for ES operations to determine success in reaching goals and to correct deficiencies in performance (20 CFR 658.601).</p>

## **ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM**

## ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM

The Unified or Combined State Plan must include a description of the following as it pertains to adult education and literacy programs and activities under title II of WIOA, the Adult Education and Family Literacy Act (AEFLA).

- (a) **Aligning of Content Standards.** Describe how the eligible agency has aligned its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

During program year 2018-19, the Learning Standards Reconciliation Project led by a group of expert trainers, created Mathematics and Language Arts Handbooks to accompany the implementation of the newly developed Oregon Adult College and Career Readiness Standards (OACCRS). Training modules were created with a view to orienting programs to the College and Career Readiness Standards (CCRS). During program year 2021-22, trainers created the Oregon Adult English Language Proficiency Standards (OAELPS) Handbook. The handbook was released at the beginning of program year 2022-23 to accompany the implementation of the OAELPS for ESOL learners. To support the implementation of OACCRS and OAELPS, an updated OACCRS/OAELPS Orientation Module, as well as a series of four OACCRS Math modules and a series of four OACCRS Language Arts/OAELPS ESOL Modules have been finalized. Training and professional development will continue to be offered on an ongoing basis to Title II program staff. Support for the development and implementation of standards-based Professional Learning Communities for local providers also continues.

- (b) **Local Activities.** Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

### Adult Education and Literacy Activities (Section 203 of WIOA)

Adult education;

Literacy;

Workplace adult education and literacy activities;

Family literacy activities;

English language acquisition activities;

Integrated English literacy and civics education;

Workforce preparation activities; or

Integrated education and training that—

1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
2. Is for the purpose of educational and career advancement.

**Special Rule.** Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

### Funding Adult Education and Literacy Programs

The eligible agency administering the WIOA Title II program in Oregon is the Higher Education Coordinating Commission (HECC): Office of Community Colleges and Workforce Development (CCWD). In July 2022, CCWD awarded three-year grants through a Request for Application (RFA) process 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.

Grantees receiving funds under the competition receive program budgets each year based on a performance-based funding model. Annual sub-grant continuation depends upon program compliance and performance. 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):

1. 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.
2. 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, are 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 was 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 ensured that all eligible providers had 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 were 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 the following terms. Oregon will fund the following activities; however, not all providers will be required to provide the following programs, activities, and services, but WIOA Title II funds may be used to support them:

- 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) and Oregon Adult English Language Proficiency Standards (OAELPS) 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 and OAELPS 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 and OAELPS support Title II Adult Basic Skills service providers’ goal of improving access to and completion of postsecondary credentials.

Oregon also uses integrated approaches such as I-BEST, Integrated Education and Training, 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 students in pathways and bridge programs in occupational areas such as welding, health care, computer applications, HVAC, and automotive technology. As of the 2023-24 Academic Year, Career Pathways grants include support for and expansion of Integrated Education and Training as a required component for funding. These grants encourage recipients to partner with Title II Adult Basic Skills and Perkins funded CTE program providers to leverage resources and align curriculum. Career Pathways funding provides dedicated support services and can be used for expenses that are not Title II eligible and Perkins can provide equipment and CTE instructor professional development.

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 Opportunity and the STEP (SNAP Training and Employment Program) Consortium to provide wraparound services for participants.

CCWD requires 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 the reading, writing, mathematics, and English proficiency of eligible individuals. The scope, content, and organization of local activities are described below.

CCWD requires all applicants to offer adult education and literacy activities and English language acquisition activities where there is a 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)/Oregon Adult English Language Proficiency Standards (OAELPS) which include the essential components of reading, must be evident in curriculum and instruction.

Organization: Adult education and literacy activities will use technology, services, and delivery systems, which may include distance education 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 the Oregon Adult Basic Skills WIOA Title II Adult Education and Literacy Grant Policy Manual. Programs will assess learners with approved tests and place 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/OAELPS must be evident in 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 to lead to the attainment of a secondary school diploma or its recognized equivalent, and transition to postsecondary education or training or employment.

Implementation of the OACCRS/OAELPS 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, and delivery systems, including distance education 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. Pin transitioning to postsecondary education or employment or offer English language acquisition as part of a career pathway.

CCWD requires all eligible applicants receiving Section 231 funds to offer integrated education and training (IET) activities, including workforce preparation activities.

#### Family Literacy Activities

Scope: Some providers may offer family literacy activities during the five-year grant cycle.

Content: The content of the family literacy activities will be activities that make sustainable improvements for a family and that better enable the parents or family members to support their children's learning needs.

Organization: Family literacy activities must integrate the following activities: parent or family adult education and literacy activities that lead to readiness for postsecondary education or training, career advancement, and economic self-sufficiency; interactive literacy activities between parents or family members and their children; training for parents or family members regarding how to be the primary teacher for their children and full partners in the education of their children, and age-appropriate education to prepare children for success in school and life experiences.

#### Integrated English Literacy and Civics Education

Scope: Some providers will offer Integrated English Literacy and Civic Education services during the five-year grant period.

Content: The content of Integrated English Literacy and Civics Education are services provided to English language learners who are adults, including professionals with degrees and credentials in their native countries, that enable such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. Such services shall include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation and may include workforce training.

Organization: Local providers will build IELCE services on the successful practices and principles related to citizenship and civic participation contexts. In support of this work, the state launched its Burlington English pilot in PY2021-22 with the purchase of 1,000 seats for distribution across the state based on an RFA process. In 2022-23, the state expanded the use of the program with the purchase of 2,000 seats for use across the state, again based on an RFA process. At least one program has received statewide attention for its use of Burlington English to provide ESOL learners with a quick pathway to in-demand careers by integrating Burlington English into a welding Integrated Education and Training curriculum. In general, field response to Burlington English has been very favorable, with overall positive feedback from administration, teachers, and students.

### Workforce Preparation Activities

Scope: Each provider with a WIOA TII Comprehensive grant or a WIOA TII IELCE grant will be required to offer workforce preparation activities.

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/OAELPS must be evident in curriculum and instruction.

Organization: Workforce preparation will be offered concurrently with another activity such as adult education and literacy, English language acquisition, or integrated English literacy and civics, and meet the organizational requirements for those activities. Implementation of the OACCRS/ OAELPS 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: Each provider with a WIOA TII Comprehensive grant or a WIOA TII IELCE grant will be required to offer Integrated Education and Training (IET) activities.

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/OAELPS, workforce preparation activities and workforce training competencies.

Organization: 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/OAELPS. 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 grant cycle.

#### Workplace Adult Education and Literacy Activities

Scope: Some providers will offer workplace adult education and literacy activities during the five- 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/OAELPS 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/OAELPS must be evident in the organization of instruction.

#### (c) **Corrections Education and other Education of Institutionalized Individuals.**

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate programs that provide any of the following correctional educational programs identified in section 225 of WIOA:

- 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 the education of other institutionalized individuals under section 225 of WIOA. The amount of funding will not exceed the 20% allowable under WIOA. Academic programming may include adult education and literacy activities, English language acquisition activities, integrated education and training, career pathways, secondary school credit, and peer tutoring. Where feasible, section 225 funds

will also be used for integrated education and training and career pathways to increase the number of institutionalized individuals transitioning to postsecondary education.

Grants of Section 225 funds will be awarded in a separate application process following the requirements of Subpart C in Title II of WIOA. CCWD ensured that all eligible providers had 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 gave 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.

**(c) Integrated English Literacy and Civics Education Program.** Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate Integrated English Literacy and Civics Education (IELCE) programs under section 243 of WIOA. Describe how adult English language learners, including professionals with degrees and credentials in their native countries, are served in IELCE programs.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be offered in combination with integrated education and training activities found in 34 CFR section 463.36.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation.

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.

Programs funded under section 243(a) will have the additional requirement to provide Integrated English literacy and civics education in combination with integrated education and training services (IETs). Programs offered under section 243(a) of WIOA must also be designed in consultation with the local workforce board and lead the participant to unsubsidized employment opportunities, economic self-sufficiency, and be within locally identified in-demand industries.

CCWD distributes 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. A new multi-year competition for grant funds beginning PY22 was held and Grantees receiving funds under the competition are required to negotiate program budgets each year using the existing performance—based funding model. The grants are for a five-year period and continuation will be dependent upon program compliance and performance.

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 IELCE 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;
- A language and life-skills course with a strong civics focus, such as the Burlington English course "English in America: Civics and Life Skills for Living in the U.S." Students engage in units on becoming a citizen, education, emergencies, diversity, digital literacy, and the environment and practice civics activities through role playing, filling out forms, giving presentations, writing emails, and more; 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, healthcare providers, and insurance carriers to inform parents how to access care and services for themselves and their children.

(d) **State Leadership.** 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:

- Continue expansion of models that support the transition to Career and Technical Education credit-bearing courses such as Integrated Education and Training, and Vocational English as a Second Language.
- Participation and active engagement in the Oregon Workforce System Executive Team (WSET). The team is a partnership consisting of the Workforce Innovation and Opportunity Act (WIOA) Program Directors who are committed to an aligned vision of the workforce system and who seek to collectively serve business and program participants across programs and funding streams and are 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 into career pathways.
- Continue to support 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/OAELPS, and Program Administration. These activities will be outlined in the Oregon Adult Basic Skills Policy Manual.
- Statewide professional development in the five areas of focus identified in the Oregon ABS Professional Development Plan: learning standards, program and student data, distance learning and digital literacy, integrated education and training (IETs), and motivating and engaging adult learners.

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 monitoring to ensure compliance with federal policy, federal guidance, state policy and grant conditions. A Program Improvement Plans will be developed to identify specific areas for improvement in each WIOA TII program.
- 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 the 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 also continue the expansion of models that support the transition to Career and Technical Education credit-bearing courses such as Integrated Education and Training, and Vocational English as a Second Language.
  - 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 and activities that are based upon state and local program needs to improve and/or ensure program quality and compliance, as outlined in the Oregon ABS Professional Development plan and including learning standards, program and student data, distance learning and digital literacy, integrated education and training (IETs), and motivating and engaging adult learners.
  - Support state and local participation in professional development at state and local meetings and conferences.

(e) **Assessing Quality.** Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II. Describe how the eligible agency will take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA. Describe how the eligible agency will use evaluations, data analysis, program monitoring, or other methods to improve the quality of adult education activities in the State.

CCWD as the eligible agency will assess the quality of adult education and literacy activities regularly 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 can reflect on each training day or event and share their reflections with the professional development staff. This keeps the training team apprised of the participants' progress, understanding, and plans for using new information. The State has developed and implemented interactive training modules - to support the Oregon Adult College and Career Readiness Standards and Oregon Adult English Language Standards. Faculty are able to work in groups, with workshops facilitated by a trainer, or in self-paced mode on the Canvas LMS using a variety of resources 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 identified in the Oregon ABS Professional Development Plan and Framework to ensure the quality of professional development.

These activities include attendance at professional development planning meetings, online trainings for faculty, program administrators, and data professionals, participation in 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 to identify those programs in which professional development technical assistance is needed. The State ABS Team will also review data related to student outcomes (for example Measurable Skill Gains) and offer technical assistance to programs.

Oregon will use a variety of data sources including but not limited to program performance to determine if the professional development and technical assistance we are providing is achieving the desired outcomes for the program.

**ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS AND ASSURANCES**

<b>States must provide written and signed certifications that:</b>	
1.	The plan is submitted by the State agency that is eligible to submit the plan;
2.	The State agency has authority under State law to perform the functions of the State under the program;
3.	The State legally may carry out each provision of the plan;
4.	All provisions of the plan are consistent with State law;
5.	A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;
6.	The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;
7.	The agency that is submitting the plan has adopted or otherwise formally approved the plan; and
8.	The plan is the basis for State operation and administration of the program;
<b>The State Plan must include assurances that:</b>	
1.	The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);
2.	The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;
3.	The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not “eligible individuals” within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;

4.	Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.
5.	The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).

## Section 427 of the General Education Provisions Act (GEPA)

*Instructions: In the text box below, describe the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs provide the information to meet the requirements of Section 427 of the General Education Provisions Act (GEPA), consistent with the following instructions. [Click here to enter text.](#)*

OMB Control No. 1894-0005 (Exp. 04/30/2020)

### NOTICE TO ALL APPLICANTS

*Review the linked document. Where “applicant” is mentioned, that refers to the State eligible agency and “application” refers to the state plan. This element does not apply to local providers for state plan purposes. State eligible agencies are required to maintain local GEPA responses separately from the state plan. The State eligible agency must provide a response to GEPA regarding use of AEFLA State Administration and State Leadership funds in the State Plan.*

The purpose of this enclosure is to inform you about the following provision in the Department of Education's General Education Provisions Act (GEPA) that applies to applicants for new grant awards under Department programs. This provision is Section 427 of GEPA, enacted as part of the Improving America's Schools Act of 1994 (Public Law (P.L.) 103-382).

### To Whom Does This Provision Apply?

Section 427 of GEPA affects applicants for new grant awards under this program. **ALL APPLICANTS FOR NEW AWARDS MUST INCLUDE INFORMATION IN THEIR APPLICATIONS TO ADDRESS THIS NEW PROVISION IN ORDER TO RECEIVE FUNDING UNDER THIS PROGRAM.**

(If this program is a State-formula grant program, a State needs to provide this description only for projects or activities that it carries out with funds reserved for State-level uses. In addition, local school districts or other eligible applicants that apply to the State for funding need to provide this description in their applications to the State for funding. The State would be responsible for ensuring that the school district or other local entity has submitted a sufficient section 427 statement as described below.)

### What Does This Provision Require?

Section 427 requires each applicant for funds (other than an individual person) to include in its application a description of the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs.

This provision allows applicants discretion in developing the required description. The statute highlights six types of barriers that can impede equitable access or participation: gender, race, national origin, color, disability, or age. Based on local circumstances, you should determine whether these or other barriers may prevent your students, teachers, etc. from such access or participation in, the Federally-funded project or activity. The description in your application of steps to be taken to overcome these barriers need not be lengthy; you may provide a clear and succinct description of how you plan to address those barriers that are applicable to your circumstances. In addition, the information may be provided in a single narrative, or, if appropriate, may be discussed in connection with related topics in the application.

Section 427 is not intended to duplicate the requirements of civil rights statutes, but rather to ensure that, in designing their projects, applicants for Federal funds address equity concerns that may affect the ability of certain potential beneficiaries to fully participate in the project and to achieve to high standards. Consistent with program requirements and its approved application, an applicant may use the Federal funds awarded to it to eliminate barriers it identifies.

### **What are Examples of How an Applicant Might Satisfy the Requirement of This Provision?**

The following examples may help illustrate how an applicant may comply with Section 427.

- (1) An applicant that proposes to carry out an adult literacy project serving, among others, adults with limited English proficiency, might describe in its application how it intends to distribute a brochure about the proposed project to such potential participants in their native language.
- (2) An applicant that proposes to develop instructional materials for classroom use might describe how it will make the materials available on audio tape or in braille for students who are blind.
- (3) An applicant that proposes to carry out a model science program for secondary students and is concerned that girls may be less likely than boys to enroll in the course, might indicate how it intends to conduct "outreach" efforts to girls, to encourage their enrollment.
- (4) An applicant that proposes a project to increase school safety might describe the special efforts it will take to address concern of lesbian, gay, bisexual, and transgender students, and efforts to reach out to and involve the families of LGBT students

We recognize that many applicants may already be implementing effective steps to ensure equity of access and participation in their grant programs, and we appreciate your cooperation in responding to the requirements of this provision.

### **Estimated Burden Statement for GEPA Requirements**

**According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. Public reporting burden for this collection of information is estimated to average 1.5 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain benefit (Public Law 103-382. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Education, 400 Maryland**

Ave., SW, Washington, DC 20210-4537 or email [ICDocketMgr@ed.gov](mailto:ICDocketMgr@ed.gov) and reference the OMB Control Number 1894-0005.

1. [SF424B - Assurances – Non-Construction Programs](http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)  
(<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)  
(<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)  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)

**VOCATIONAL REHABILITATION UNDER TITLE IV**  
**Oregon Department of Human Services Vocational Rehabilitation**

**VOCATIONAL REHABILITATION – Oregon DHS Vocational Rehabilitation**

**Program-Specific Requirements for State Vocational Rehabilitation Services Program**

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

**(a) State Rehabilitation Council.** All VR agencies, except for those that have an independent consumer-controlled commission, must have a State Rehabilitation Council (Council or SRC) that meets the criteria in section 105 of the Rehabilitation Act. The designated State agency or designated State unit, as applicable, has (select A or B):

(A) is an independent State commission.

(B) has established a State Rehabilitation Council.

Oregon has an established State Rehabilitation Council.

In accordance with Assurance 3(b), please provide information on the current composition of the Council by representative type, including the term number of the representative, as applicable, and any vacancies, as well as the beginning dates of each representative’s term.

<b>Council Representative</b>	<b>Current Term Number/ Vacant</b>	<b>Beginning Date of Term Mo./Yr.</b>
Statewide Independent Living Council (SILC), Brooke Wilson	1	10/25/2022
Parent Training and Information Center, Christy Reese	2	12/1/2022
Client Assistance Program, Corinne Schram	1	3/29/2023
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency), Rose Pabon	1	3/25/2022
Community Rehabilitation Program Service Provider, Jennifer Cassidy	1	3/29/2023

<b>Council Representative</b>	<b>Current Term Number/ Vacant</b>	<b>Beginning Date of Term Mo./Yr.</b>
Business, Industry, and Labor, Ed Cortez (waiting for second term appointment)	1	1/11/2021
Business, Industry, and Labor, Bridget Dazey	2	10/27/2023
Business, Industry, and Labor, Brain Sacre	1	3/1/2022
Business, Industry, and Labor, Nicholas Kaasa	1	3/25/2022
Disability Advocacy Groups, Emily Purry	2	10/1/2022
Current or Former Applicants for, or Recipients of, VR services	vacant/ recruiting	
Section 121 Project Directors in the State (as applicable), Susie Calhoun	4	12/1/2022
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	1	3/1/2022
State Workforce Development Board	vacant/chronic	
VR Agency Director (Ex Officio), Keith Ozols (should be officially appointed by February 2024)		
Developmental Disability Services Partner (state), Brad Collins finishing Allison Enriquez term	1	10/25/2022
CRP education partner, Chien-Chun Lin	1	3/23/2023

If the SRC is not meeting the composition requirements in section 105(b) of the Rehabilitation Act and/or is not meeting quarterly as required in section 105(f) of the Rehabilitation Act, provide the steps that the VR agency is taking to ensure it meets those requirements.

**Agency response:**

The SRC coordinator is actively working to recruit a new Former or Current VR client as the last one termed off in October. This has been an ongoing effort with special attention to age, type of disability, and other diversity needs of the council. An appointment with an applicant is scheduled for Jan 11, 2024, to interview the applicant and she is planning on doing what it takes

to meet requirements to be voted in during the February quarterly meeting. Continued recruiting for current and former VR clients will continue to fulfill the need for representation in southern Oregon and within the age group of under 30 years old. The WFTDB position has been vacant as the terms for that board don't coincide with the terms for the SRC. The SRC coordinator has been in contact with the staff and members of that WFTDB, as well as the Oregon Governor's office in the case that she may need to appoint someone directly, as per the policy, to get back into compliance.

In accordance with the requirements in section 101(a)(21)(A)(ii)(III) of the Rehabilitation Act, include a summary of the Council's input (including how it was obtained) into the State Plan and any State Plan revisions, including recommendations from the Council's annual reports, the review and analysis of consumer satisfaction and other Council reports.

Provide the VR agency's response to the Council's input and recommendations, including an explanation for the rejection of any input and recommendations.

**Agency response:**

**SRC input 1:** The SRC recommends that the State Plan Strategies to address the goals and priorities are written in a way that is Specific, Measurable, Achievable, Relevant, and Time-bound (SMART). When reviewing the last State Plan, this committee felt that there were many goals that were not definable, measurable, or trackable. The SRC would like to have a formal mechanism for tracking the goals, know who is assigned to monitor these goals, and receive reports as they are available but no less than annually on how the goals are being implemented and if they are successful and what are the barriers and possible solutions if they are not.

**Agency response:** The VR Program agrees that having Specific, Measurable, Achievable, Relevant, and Time-bound (SMART) goals is a valuable mechanism to evaluate effectiveness in project implementation and programmatic change. As the program started working with RSA on our Corrective Action Plan from our recent monitoring visit the program committed to utilizing a SMART approach to addressing each of the areas of that plan. Those SMART Goals are posted on the VR's OWL intranet site so all staff have access to the SMART goals and their progress. The VR Program agrees to utilize this same approach with the goals, and specifically with the strategies that will be set to accomplish the larger goals of the State Plan. And the program will also provide the SRC with updates no less than annually. Because this state plan will cover the next four years and because the program is currently working on the CAP with RSA it would not be prudent to include within this plan some elements of the SMART process. For example, establishing beginning dates for each goal will need to be timed and sequenced when appropriate and when sufficient resources and staff capacity is available for a successful implementation of the strategies.

**SRC input 2:** Consistent practices across the state. Meaning each branch is functioning similarly. Staff, customers and vendor/partners would have the same experience regardless of which VR branch they are working in or accessing services from.

SRC recommendations:

- Consistent staff training on updated VR policy manual (at least annually).
- Updated staff training on customer service that include person centered practices.
- Ensure consistent evaluation of meaningful client contact per VR policy.
- Standardized file review practices that are adopted statewide and trained to in each VR branch.
  - Data collection will become more consistent with a standardized file review process that records and gathers data.
  - Standard training for all staff based on information gathered from the file and service review.
  - Standardized new staff training.
  - Create, fund, and implement a service quality review process as part of the consumer satisfaction survey conducted by the SRC. This survey should go out automatically to clients and vendors at certain points in the process to make sure the client is being served well before exiting or closing their case.
  - Manager review standardization: The RSA report indicates there is an expectation branch managers review cases. It was stated that each office has its own process and tools for doing service record reviews and onboarding. There is an expectation that branch managers also conduct reviews; however, each office has its own process and tools for conducting service record reviews and onboarding new staff.

**Agency response:** The VR Program agrees to establish consistencies in practices across the state. To accomplish this the Program will standardize training for VR staff and establish statewide procedures to foster alignment in service delivery across the state. Additionally, the program will formalize state comprehensive Quality Assurance (QA) and File Review processes to ensure adherence to policy. Reviews will be conducted at the local branch level and at a statewide level. The QA Team and other appropriate VR staff will work with the SRC's Evaluation and Recommendations subcommittee to review the Client Satisfaction Survey and other data to develop recommendations based on the client's experience. As themes are discovered the QA team will work with the Training team and the Leadership teams to develop appropriate interventions and trainings to address the non-compliance issues. As themes are discovered the QA will review and share with agency and direct service leadership, training staff, and policy staff to ensure findings are addressed. As the VR Program does recognize the need for consistent practices leading to consistent experiences throughout the state there may be some variation due to local branch realities. One example might be the use of specialized caseloads in some areas.

**SRC input 3:** Increase communication that is representative of a client centered approach that includes disability specific culturally and linguistically appropriate communications.

- Communication between counselor and client should be trauma informed, non-violent, empowerment-based, using motivational interviewing techniques.
- Customer engagement: Create possible plan for VR to contact clients more frequently (e.g., every 30 days-using multiple modalities) and supervisors or management to review all cases prior to closure.
- Clients have expressed a mix of responses about satisfaction with virtual appointments. Steps should be taken to use the clients' preferred method and frequency of contact and learn what works best for them and why. Virtual appointments should be at the request of the client and/or members of their team, not for the convenience of the program staff.

**Agency response:** The VR Program is in agreement with the SRC and with RSA's recently released TAC 24-01 that the best way to engage and build trust with clients is to maintain meaningful and sustained engagement with them throughout the VR process. The VR program will develop policies and practices to set clear guidelines for staff on how to engage with clients and respond to client's needs in a timely manner.

**SRC input 4:** The SRC recommends that VR develops a defined menu of some of the individual services that could help clients overcome the functional limitations that the individual presents and the Clients and Contractors can use to determine what services can be requested, required, and/or supported. Align definitions of supported employment to include IPS services, customized employment and supported employment services with the regulatory definitions. Supported Employment Services are "on-going support services that begin at intake, continue with engagement, IPE, Job Search/Job Development and Follow-Along services, which may include job coaching."

SRC recommendation: update policies, procedures and provide all-staff training on these updated supported employment policies.

**Agency response:** OVRs has recently updated our public facing website with "examples of services you can get" in the "What Kinds of Services Can I Get" section: <https://www.oregon.gov/odhs/vr/Pages/clients.aspx>. Because the IPE is highly individualized, and the services need to address each individuals' barriers to employment could be vast, it would be difficulty to create a comprehensive list of potential services. The agency agrees that staff could benefit from training on informed choice to be able to truly be a partner in developing each IPE with appropriate services. The program is finalizing the informed choice policy and will develop training for staff.

**SRC input 5:** The SRC recommends VR provide a more robust postsecondary education plan to youth and adults that supports their areas of interest and follows VR clients' journey towards high wage jobs and self-employment opportunities.

- Continue to prioritize and track the success rate/completion rate of secondary education opportunities for youth and adults through the Inclusive Career Advancement Program (ICAP) and other training opportunities like internships, work-based learning, apprenticeships, trade school and certifications to help clients direct their own desired employment goal.
- Introduce students of all ages with disabilities to assistive technology and other accommodations earlier in their school/career experience.
- Encourage VR staff to attend IEP meetings and explore career development with students, families, and support people.

**Agency response:** The VR Program agrees that there are opportunities to create more robust supports for clients and potentially eligible individuals seeing postsecondary education and training. The program also agrees that Assistive Technology can be a vital support to assist access and completion of postsecondary training programs. Currently VR developing new contracts for the delivery of Pre-ETS. These contracts will provide clarity around delivering postsecondary exploration for those potentially eligible students and eligible VR clients that can receive Pre-ETS. Secondly, VR has recently updated the Postsecondary Education policy to streamline the process and to provide more authority to the counselors to approve plans that include postsecondary education and training services. The VR Program is committed to deepening the relationship with programs that provide assistive technology and the program will provide tools and guidance for staff about how to access and utilize these tools. The VR Program is encouraged by the early results from the Inclusive Career Advancement Program (ICAP), the Disability Innovation Grant funded program, that partners VR with Community Colleges across the state to create career pathways for VR clients. VR commits to continue investing in all of these efforts and seek other best practices in supporting people with disabilities in postsecondary education.

**SRC input 6:** The SRC recommends VR expands services with the Centers for Independent Living, etc. around benefits planning.

**Agency response:** The VR Program agrees that additional resources would benefit the Centers for Independent Living and the Work Incentive Network of benefit planners across the state. The VR Program will continue to seek additional funding through the legislative process. Additionally, the program will seek to identify other resources with other governmental and non-governmental programs that could co-fund these services. The VR Program also will commit to partnering with the Centers for Independent Living to identify other funding streams that the Centers could pursue to diversify their funding streams for a more sustainable budget.

**SRC input 7:** To better partner with VR in a timely and effective manner, the SRC requests that the VR program collaboratively create engagement processes like timelines and communication strategies, for the projects that the SRC and VR program must partner. These projects include, but are not limited to the State Plan, the CSNA, and the consumer satisfaction survey (CSS). Council members request timely notifications of project activities to create sufficient

subcommittee workplans that are commensurate with high quality inputs by SRC members and thus project outcomes; regardless of who is in positions responsible for managing these projects.

**Agency response:** The Program agrees to collaborating with the SRC on shared projects like the State Plan, CSNA and Client Satisfaction Survey. The Program will assign VR staff to participate in each of the SRC's subcommittees to ensure good communication and resources to accomplish shared goals. Additionally, the Program proposes that members of the SRC and VR Leadership convene a workgroup to develop a long-range timeline of upcoming projects to establish transparent beginning and end dates for upcoming projects.

**SRC input 8:** Support increasing the response rate to the consumer satisfaction survey by partnering with other organizations that serve culturally diverse VR clients.

SRC recommendation: To assist in CSS dissemination among diverse geographical and racial and ethnic groups across Oregon, partner with providers who speak languages other than English and are relevant to the cultural identity.

**Agency response:** The VR Program is supportive of the goal to increase the response rate of culturally diverse populations. While the Client Satisfaction Survey is one of the primary responsibilities of the SRC the Program commits to partnering with the SRC in this effort. One forum for this activity would be the existing Evaluation and Recommendations subcommittee although there will be other opportunities for the Program to support the SRC.

**SRC input 9:** Vendors contracting with VR have expressed technical difficulties and long wait times using the OregonBuys system. Further, Workday poses its own barriers to vendor success. SRC recommendation: SRC recommends making sure that a VR support liaison is available to assist vendors' use with both of these systems. This can ensure smooth application processes, decreased wait times, and Workday system efficiencies.

**Agency response:** The VR Program agrees that the OregonBuys and Workday systems can be a barrier for some providers. These systems are not under the authority and administration of the VR Program therefore the Program is limited in what change can be made to those third-party programs. With that understanding the Program is committed to advocating for greater supports provided by OregonBuys and Workday to providers and potential vendors trying to navigate those systems. Additionally, the VR Administration and Contracts team will continue to assist providers and potential vendors to the greatest ability within our authorized role as a program utilizing the OregonBuys and Workday systems.

**SRC input 10:** Increased capacity and diversity for services in rural areas- (CSNA may have additional details to be added here) Rural VR partners have articulated a paucity of program-supported ways to ensure clients have the full range of program provisions enjoyed by clients in

more urban areas. Partners articulate creativity in developing relationships and opportunities for client success and would like more support from VR in consider outside-the-box alternatives.

**Agency response:** The VR Program agrees that there is a need in some areas across the state for additional service providers and for multilingual and culturally responsive service providers. And the program is committed to increasing the services providers and the skills of internal staff to meet the needs of diverse populations and rural communities across the state. Some of the resources the Program is investing in to meet these goals is to partner with the Office of Equity and Multicultural Services and their Community Outreach team to seek out culturally diverse community-based organizations that could provide VR services. Additionally, VR's Youth team is developing contracts and opportunities for culturally diverse community-based organizations to provide those earliest interventions in a culturally responsive manner to best serve individuals seeking VR services.

**(b) Comprehensive Statewide Needs Assessment (CSNA).** Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

(1) The VR services needs of individuals with disabilities residing within the State, including:

(A) Individuals with the most significant disabilities and their need for Supported Employment;

**Agency response:**

- Oregon DHS VR is encouraged to continue to explore ways to increase and improve transportation options for individuals with disabilities in Oregon. Oregon DHS VR can explore the creation of transportation task forces in rural counties/communities or use transportation network companies to identify options available and solutions for developing additional transportation resources.
- Oregon DHS VR may consider identifying opportunities for key state-level and local partners to convene to strategize the expansion of individualized placement and support and fidelity-based customized employment programs within the state.
- VR is encouraged to investigate the National Supported Employment Community of Practice facilitated by the Center for Innovative Training in VR at George Washington University. Representatives from VR systems nationwide learn together and benefit from shared problem-solving opportunities.
- Oregon DHS VR may consider providing SE training for all staff and CRPs to increase the use of this model where appropriate. This training should include the essential elements noted by nationally recognized groups like APSE and ACRE.

- Oregon DHS VR may consider exploring new SE vendors in rural areas through pilots on unique reimbursement models to start building a network of qualified Oregon DHS VR providers for these services.
- Oregon DHS VR can explore options to ensure that all staff have access to and knowledge of affordable housing resources for their clients, including the 211 searchable database, affordable housing lists published by OHCS, supportive housing under section 811 for people with disabilities, and community action agencies. Oregon DHS VR should collaborate with other state agencies to develop a cross-agency task force to formulate targeted plans to address these gaps.

(B) Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program;

**Agency response:**

- Oregon DHS VR is encouraged to enhance the environment and culture of inclusion in the offices across the state.
- Oregon DHS VR is encouraged to review the feasibility of creating disability or process-specific VR counselors to focus on outreach and increased services for the unserved and underserved population groups identified in the needs assessment process.
- Oregon DHS VR may want to collaborate with state-level and local services and resources for aging Oregonians and potentially develop a working group to address this unique population.
- Oregon DHS VR may want to expand staff training in Cultural Brokering and Disabilities and Culture to identify gaps and design solutions to develop culturally inclusive and proficient practices within VR based on state and region-specific needs.
- Oregon DHS may consider the points under recommendation 2.5 related to individuals residing in rural areas as an unserved population and develop a specific working group, including rural residents, rural business leaders, tribal VR representatives, and CRPs, to establish an improvement plan.
- Oregon DHS may consider establishing new partnerships and building on current partnerships with community organizations not typically engaged with VR but embedded in communities (i.e., cultural centers, places of worship, foster care agencies, homeless shelters, food banks, and community centers). These efforts could increase awareness of their services and build trust within these underserved communities.
- Oregon DHS VR is encouraged to continue to recruit and hire additional bilingual staff to increase their ability to communicate with minority populations.
- Oregon DHS VR is encouraged to provide training on trauma-informed care for all staff. Motivational interviewing, intersectionality, and cultural responsiveness, and how these elements impact individuals with disabilities.

(C) Individuals with disabilities served through other components of the workforce development system; and

**Agency response:**

- Oregon DHS VR is encouraged to reach out to the Oregon WorkSource across the state actively and to identify opportunities for training center staff on effectively working with individuals with disabilities.
- Oregon DHS VR is encouraged to develop a plan for creating and facilitating Disability Awareness training for Oregon WorkSource staff. Oregon DHS VR and WorkSource should explore cross-training opportunities where staff in both systems can learn from each other. Mutually attended events will contribute to networking, rapport-building, and resource sharing.
- Oregon DHS VR is encouraged to explore co-located or designated staff at each WorkSource office (and vice-versa) whenever possible.
- Oregon DHS VR should seek to broaden the use of effective collaborative practices highlighted by the Center for Advancing Policy on Employment for Youth and other national centers. An essential resource on advancing partnerships with WIOA Title I programs includes [Unlocking the Potential of Title I](#).
- Oregon DHS VR is encouraged to co-create a resource guide (and training) for SW/VR to collaboratively provide to businesses about hiring, training, accommodating, and retaining employees with disabilities.
- In partnership with the Oregon WorkSource, Oregon DHS VR should seek to implement Integrated Resource Teams (IRTs) for consumers served by the more extensive Workforce Development system. This team approach has proven to assist with leveraging resources and increasing positive outcomes through shared planning and service delivery. More information can be found at [https://disability.workforcegps.org/resources/2019/Integrated\\_Resource\\_Team\\_Information\\_and\\_Resources](https://disability.workforcegps.org/resources/2019/Integrated_Resource_Team_Information_and_Resources).

(D) Youth with disabilities, including students with disabilities and their need for pre-employment transition services. 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 IDEA.

**Agency response:**

- Oregon DHS VR is encouraged to engage in significant outreach to youth and students with disabilities throughout the State to effectively mitigate the challenges cited related to accessing YTP, SYEP, and the transition to “adult VR” services.

- Oregon DHS VR would benefit from re-establishing and nurturing relationships with the local school districts across the State.
- Oregon DHS VR is encouraged to explore the opportunity to contract with additional vendors to provide pre-employment transition services.
- Oregon DHS VR is encouraged to create marketing tools and make resources accessible to navigate for families.
- Oregon DHS VR is encouraged to formulate an outreach plan to transition staff and families to ensure all students with disabilities have access to information about VR services.
- Oregon DHS VR is encouraged to identify “mentor families” who could provide peer support to new families.
- In partnership with Education, Oregon DHS VR is encouraged to establish Model Transition Program sites where transition and Pre-ETS thrive. These MTPs could serve as a demonstration or mentor school for lower-performing schools. Schools in rural locations should receive technical assistance to demonstrate the same practices adapted to their setting.
- Oregon DHS VR is encouraged to promote postsecondary education training for youth in transition. There is room for growth in the number of individuals supported by the agency in higher education programs, and youth in transition are an important focus in this area. The existence of the Individual Career Advancement Program (ICAP) funded by RSA can be further leveraged to advance this work and expand beyond the state's community college system.
- Oregon DHS VR is encouraged to continue to provide self-advocacy skills instruction for students with disabilities. This area of strength for the agency can be augmented by developing and implementing a peer mentoring program across the State. One possibility is an online peer mentoring program available through PolicyWorks at <https://disabilitypolicyworks.org/peer-mentoringworks-2/>. A vital component of this mentoring program is the development of self-advocacy skills in youth and students with disabilities.

(2) Identify the need to establish, develop, or improve community rehabilitation programs within the State.

**Agency response:**

- Oregon DHS-VR is encouraged to partner with Oregon APSE and other CRP Groups to assess gaps and needs in the field and co-develop a strategic plan for attracting professionals to the state's CRP and VR positions.
- Oregon DHS-VR is encouraged to engage in cross-training opportunities with CRPs using Person-Centered models, motivational interviewing, trauma-informed practices, and culturally responsive approaches.

- Oregon DHS-VR may consider expanding the J-DOT training and developing a training series in alignment with APSE, ACRE, or other national standards related to providing high-quality employment services.
- Oregon DHS VR is encouraged to develop SE and CE providers for their consumers who need these services in areas with limited access to these services or a selection of CRPs.

**(c) Goals, Priorities, and Strategies.** Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State’s performance under the performance accountability measures of section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under section 107 of the Rehabilitation Act. VR agencies must—

- (1) Describe how the SRC and the VR agency jointly developed and agreed to the goals and priorities and any revisions; and

**Agency and SRC response:**

The SRC and VR agency worked in close partnership to prepare for and develop the goals and priorities for this combined state plan. VR partnered with the SRC in 2023 to help plan and prepare for a Comprehensive Statewide Needs Assessment (CSNA) and three Combined State Plan public forums. Both parties worked diligently to create in-person and virtual opportunities for customers, partners, and staff to share their experiences, insights, and ideas for improvement within the VR program. The SRC and VR sent invitations to events in multiple languages, provided interpreters, and translated documents to staff, partners, businesses, and customers to ensure diverse participation in this process. Additionally, an electronic survey was used to gather input from those who could not attend or were not comfortable speaking up in a public forum. The results of the CSNA, public forums, and survey were compiled and reviewed for consistent themes that were used to inform the goals and priorities of this plan. Themes identified were consistent across all findings. Continuous efforts will be made by VR and the SRC to partner in the accomplishment and tracking of these goals and priorities.

- (2) Identify measurable goals and priorities in carrying out the VR and Supported Employment programs and the basis for selecting the goals and priorities (e.g., CSNA, performance accountability measures, SRC recommendations, monitoring, other information). As required in section 101(a)(15)(D), (18), and (23), describe under each goal or priority, the strategies or methods used to achieve the goal or priority, including as applicable, description of strategies or methods that—

- (A) Support innovation and expansion activities;
- (B) Overcome barriers to accessing VR and supported employment services;
- (C) Improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services); and
- (D) Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.

**Agency response:**

**Goal 1: Do a great job assisting customers.**

Create a process to collect real-time feedback from customers to address programmatic needs or issues as they arise.

- VR will partner with the SRC to assist with the dissemination of communications to diverse geographical, racial, and ethnic groups for the purposes of the Consumer Satisfaction Surveys, Comprehensive Statewide Needs Assessments and other related outreach efforts.
- Increase meaningful communications with customers.
- Create a universally designed video which provides an overview of the VR process for prospective and engaged customers.
- Develop process materials for customers to improve their understanding of the VR process and activities.
- Implement outreach measures that create visibility and awareness proportionally across the state, through enhanced partnerships with the public workforce system, community-based organizations, and other programs for individuals with disabilities.
- Train VR staff on the function and use of assistive technology to improve customer access to these supports.

Communicate with customers in their preferred language or format to foster meaningful engagement in the VR process.

- Provide a system to allow for client-specific document to be translated into their preferred language.
- Standard VR Forms will be available in alternate languages and formats.
- External outreach and communications will be available in alternate languages and formats.
- Provide ASL interpreters and CART for all public forums, meetings, or events.
- Ensure that VR's external website content is available in alternate languages and formats.

Move towards rapid engagement to reduce the number of customers exiting the program prior to plan development.

- Reduce the overall count of days from application to eligibility and eligibility to plan development.
- Push the authority for decision-making to the lowest appropriate levels of the process to expedite service delivery.
- Conduct a review of existing policies and procedures to revise decision-making authorities where necessary to provide authority to appropriate levels.
- Support participants in exploring career advancement through the provision of education and training services.
- The policy advisory committee will review current policy and make recommendations to the policy team that will ensure artificial barriers to service are eliminated.
- Work with the team implementing the Inclusive Career Advancement Program to identify and adopt sustainable program elements and recommendations that support access to career pathways for VR customers.

Increase the number of students receiving Pre-Employment Transition Services throughout the state.

## **Goal 2: Make and improve partnerships.**

Strengthen partnerships to create the optimal outcomes for VR customers.

- Increase the number of comparable benefits provided to customers by workforce partners.
- Update data use and sharing agreements with partners to align services and utilize comparable benefits when appropriate.
- Seek opportunities to embed VR in community settings to increase awareness of VR services and build trust within underserved communities.

Develop a process for contractors and customers to provide feedback on contracted services, relationships, and employment outcomes.

Utilize resources available within ODHS and the Office of Equity and Multicultural Services to ensure the program is intentionally engaging with contractors and vendors to meet the diverse service needs of customers.

Ensure that policies are current and available for community review and input to ensure that changes are informed by customers and partners.

- Conduct regular reviews of the VR Policy Manual and Oregon Administrative Rules (OAR) with program partners and vendors to make sure policies are current and streamlined to eliminate barriers to effective service delivery.
- The SRC Policy Committee will meet every two weeks to provide feedback and information on new and revised policies as a method to incorporate the perspectives of VR customers.
- The Rules Advisory Committee, which consists of a diverse range of community partners and other interested stakeholders, will meet and provide feedback, guidance, and insight into new and amended OARs prior to their adoption.

Continue to invest in the statewide “VR Learning Collaborative” that provides trainings for CRPs, workforce partners and other community-based organizations working with VR to provide employment services.

Provide targeted contract trainings to job placement and partner providers (CRPs).

- Provide regular and ongoing trainings on the Job Placement Services Contract Overview (JPSCO) and Job Placement Services Contract Training (JPST).
- Increase training opportunities for CRPs to be in alignment with national standards and best practices related to providing high-quality employment services.
- Engage in cross-training opportunities with CRPs using Person-Centered models, motivational interviewing, trauma-informed practices, and culturally responsive approaches.

Engage with the public workforce system and the business community via intentional, targeted outreach, relationship and partnership building.

- Provide training and consultation to business on disability awareness and accommodations in the workplace.
- Participate in local area business events to increase disability awareness and knowledge of VR services.
- Inform business partners on hiring incentives and resources to support businesses employing, supporting, retaining and promoting qualified talent with disabilities.

Engage with the National Employment Team (NET) for a unified approach to working with business customers.

Collaborate with the Oregon Employment Department’s Business Services Team members around the state on joint services to business.

Partner with the local workforce development boards (LWDB) to coordinate services and leverage resources.

Implement fee for service contract models for the delivery of Pre-Employment transition services.

- Seek out opportunities to expand the number of vendors that could provide these services throughout the state. Focusing on service availability outside of school hours, underserved communities, and rural areas of the state.
- Develop a year-round, sector industry aligned work-based learning experiences for eligible and potentially eligible students to increase opportunities for their participation.

Increase outreach, engagement, and coordination with schools, families and other youth serving programs throughout the state to ensure the provision of Pre-ETS and timely development of IPEs for students with disabilities.

- Send communications to families of students with disabilities about Pre-ETS to increase awareness.
- Develop a robust training system and schedule for partners to ensure the best delivery of Pre-Employment Transition Services and Transition services to students.
- Develop a robust training system and schedule for partners to ensure the best delivery of Pre-Employment Transition Services and Transition services to students.
- Through use of consistent quality assurance methods and monitoring, ensure youth and families are equitably accessing VR services proportionally throughout the state.

### **Goal 3: Hire and keep diverse, well-trained staff.**

Enhance the environment and support a culture of inclusion in VR offices across the state.

- Partner with the Office of Multicultural Services on the adoption and implementation of the ODHS Diversity Equity Inclusion and Belonging plan and partner with the VR Service Equity Committee.
- Expand staff training in cultural brokering and disabilities and culture to identify gaps and design solutions to develop culturally inclusive and proficient practices within VR based on the state and local needs.
- Continue to recruit diverse and bilingual staff to increase communication access and shared lived experiences for customers.
- Provide trainings for VR staff in psychosocial communication accommodations, such as; motivational interviewing, trauma-informed care, nonviolent communication, de-escalation techniques, collaborative problem solving, microaggressions, and methods for improved communication with customers.

Provide robust training and professional development opportunities for staff at all levels of the VR program. This will result in a highly trained workforce that is equipped with the skills necessary to address the needs of all VR customers.

- Create and deliver training courses to all VR staff on approved VR policies.
- Provide onboarding training to all new VR staff, including managers and administration, on current policy and procedures to develop consistent statewide implementation practices.
- Develop training plans and prioritize training topics based on case file review findings and programmatic data.
- Provide training to VR staff on expectations for customer contact.
- Provide guidance and training on rapid engagement to support timely advancement throughout each stage of the VR process.
- Create enhanced trainings on the programs case management system including its functionality and the relevance of the system to the program's overall performance and reporting requirements.
- Offer training on fiscal management to include the timely authorization of services and timely payment for approved invoices with sufficient supporting documentation.

Continue to develop and support Vocational Rehabilitation Specialists positions in the program who are subject matter experts for the program in areas of process and serving disability specific populations.

Create a supportive system for interns with Oregon VR.

- Continue and expand the internal support network for staff serving as site supervisors of interns so the experience is valuable to both the intern and the staff supervisor.
- Conduct targeted outreach to colleges with diverse student bodies and market the program with incentives to encourage students to either apply for an internship or employment with Oregon VR.

Expand and refine recruitment and hiring practices to reach a wider population of applicants. Make intentional use of ODHS resources which support and invest in a diverse workforce, which more closely represents the populations we strive to serve, to reach their highest potential. Provide direct service, program, and non-management staff with a formal mentoring program.

- Develop a mentoring program that will support to new staff and facilitate an understanding of their role. Ideally this will improve the quality of their performance and likelihood of success.
- Develop a mentoring program for staff with several years of experience to continue to elevate their skills or to expose them to different areas of the program that they may be interested in pursuing as a promotional opportunity.

**Goal 4: Make sure our processes work well and we can effectively assist customers.**

Develop and implement a comprehensive system of effective internal controls, policies, and procedures to ensure consistency with applicable Federal requirements and documentation requirements.

- Review and update required forms to reduce administrative burden to staff.
- Conduct a review of existing policies and procedures to revise decision-making authorities where necessary to provide authority to appropriate levels and expedite service delivery.
- Update the intake and application process to make accessing services simpler for customers.

Move towards rapid engagement to reduce the number of consumers that drop out prior to plan development.

- Reduce the overall count of days from application to eligibility and eligibility to plan development.

Provide mechanisms and opportunities for VR direct service staff from around the state to provide input on the vision, goals, and future direction of the agency.

- Establish advisory groups that will have rotating membership opportunities so multiple staff will have opportunities to serve in this advisory capacity. Examples of these groups are to address Policy; Youth Services; Case Management System; amongst other program areas.

Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the program is managing the Federal award in compliance with Federal statutes, regulations, and the terms of the Federal award.

- Review existing internal controls annually, and when authority updates occur, to identify if any need to be updated, developed or discontinued.
- Develop appropriate training for new and updated internal controls.
- Implement new internal controls and related procedures.
- Routinely conduct Quality Assurance reviews to test the effectiveness of the internal controls and evaluate if there are any necessary changes needed.

Draft and implement a monitoring plan with a risk management component that is compliant with the Federal and State provisions.

- Ensure that there are appropriate internal controls to support this monitoring plan.

- Develop an updated and comprehensive Monitoring Plan. The plan will encompass and monitor:
  - Program Expenditures (Business Operations and QA Fiscal components)
  - File reviews related to the fidelity of compliance with Federal and State provisions.
- Communicate with staff on all aspects of the Monitoring process and how it will be implemented.

Draft policies, procedures and internal controls over contract monitoring that include monitoring policies and procedures; a monitoring schedule; and a risk management component that is compliant with the Federal and State provisions.

- Write applicable policies and internal controls.
- Develop training for staff and contractors that is supportive of the new internal controls, policies, and contract expectations.
- Update contracts as needed.

Develop written data collection and validation policies and procedures to ensure the accuracy and validity of the data being collected and reported.

- Regularly update the programs case management system to incorporate the latest features, security patches, and improvements.
- Streamline data gathering procedures to improve staff efficiency and reduce administrative burden.
- Develop written policies and internal control processes and procedures addressing the collection, verification and reporting of data elements specific to measurable skill gains credential attainment and post-exit measures, including the required supporting documentation.

Conduct regular reviews of the VR Policy Manual to make sure policies are current and streamlined to eliminate barriers to effective service.

- The Policy Advisory Committee will meet quarterly to review current policy and ensure artificial barriers to service are eliminated.
- The Policy and Compliance team manager hosts an “open office hour” monthly to allow staff to interact, ask questions or provide feedback and suggestions.

Improve consistency of case practices by implementing a case review process to reduce findings and improve customer satisfaction.

- Conduct quarterly, annual, and ad hoc quality assurance case reviews to evaluate the quality of services provided.
- A model for multi-office case service record reviews will be developed and implemented by the QA team to ensure accuracy of local level review data and to inform policy clarifications and training needs of the program.
- Branch managers will conduct local level case reviews to assist with case-specific decision making, ensure compliance, and determine if adequate progress is being made for the customer.
- Conduct an annual statewide survey with VR customers to determine levels of satisfaction with services provided.

Provide participants with more support in navigating the self-employment process.

- Work with the policy team to simplify and clarify policy and processes for customers interested in pursuing self-employment as an employment goal, including supported self-employment.
- Provide ongoing training to VR staff on self-employment policy and processes to improve the customer experience.

Continue to develop employment services available to all VR staff provided by the internal VR Workforce and Business Relations team.

- Develop and implement a mechanism for VR staff to request case consultation or direct service support from the team.
- Offer targeted, industry-specific events and information that connects VR staff with partners and business.
- Provide VR staff, clients, and partners with training and support on employment readiness skills that are industry specific.
- Connect contracted employment service providers with businesses when an employment opportunity aligns with the customer's employment goal.

Clearly define entrance, access and feedback points for students, youth, and families engaging with VR.

**(d) Evaluation and Reports of Progress: VR and Supported Employment Goals.** For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—

- (1) Progress in achieving the goals and priorities identified for the VR and Supported Employment Programs;

**Agency response:**

Waiting on content from assigned writers – content will not be available for Comms review but will need to be included prior to posting the draft for public comment.

- (2) Performance on the performance accountability indicators under section 116 of WIOA for the most recently completed program year, reflecting actual and negotiated levels of performance. Explain any discrepancies in the actual and negotiated levels; and

**Agency response:**

As described by the Office of Forecasting, Research and Analysis (OFRA) in a December 2023 report, Oregon VR, like other agencies in Oregon Department of Human Services (ODHS), was

significantly affected by the COVID-19 pandemic starting in 2020 and the subsequent emergency orders implemented throughout the Oregon state government:

"The VR caseload was significantly impacted by COVID-19 starting in early 2020 and remained in decline until early 2022 when it finally showed signs of stabilization and gradual upward trend. The VR caseload is taking longer to recover to pre-COVID levels than other ODHS programs. However, since early 2022 the VR caseload has stabilized and began a gradual rebound. The changes in VR noted above impacted the composition of total VR caseload in terms of types of clients entering the program and how they move from the application stage to eligibility determination and in-plan stages. Some clients also receive post-employment services as part of the VR services. The total caseload has significantly declined since the state of emergency required by the COVID 19 pandemic began in Spring 2020 and continued with slower rate of decline through Fall 2021. Work with VR clients, which tends to be very contact-heavy, was suspended for a while as staff modified processes and changed the way they interacted with clients. VR has retooled, and the caseload has now stabilized and is growing. It is expected to gradually increase to the pre-pandemic levels through the middle of 2027.

Covid related disruptions in VR services and its service delivery practices are receding, and the caseload is being gradually restored to pre-Covid levels. The VR caseload decline has stabilized and rebounded. It may take a little longer to achieve the post-Covid normalcy for some VR services compared to others. For instance, while In-Eligibility service has returned to its normal pattern while In Application and In-Plan services are still fluctuating and not fully stabilized. This instability may be the result of changes that occurred in the VR Intake process during the retooling to account for Covid. Because VR has never been disrupted this way before, there is inherent risk in forecasting its recovery. Some in-person services have been replaced with remote contact depending on the preference of the VR clients. This process has caused understandable issues related to adjusting to a virtual connection and working through initial technical difficulties. Accommodations had to be made in the collection of the required signatures on paperwork from both clients and medical professionals. Although the VR program has put an "eSign" or electronic signature capacity in place. But it has its own set of technical adjustment issues that has slowed down its adoption. In addition, VR services may also be especially delayed in work placement due to a slow recovery of certain jobs in the Oregon economy."

VR can provide services to any child with an Individualized Education Plan (IEP) in schools between ages 14 and 24. VR staff, when invited to IEP meetings, can then work with school districts to identify certain employment and pre-employment service needs of these students with disabilities. This process helps to identify the number of youths with disabilities that will need services with finding jobs in the future as they become adults. VR then provides pre-employment transition services to those students. This youth population's potential entry into VR services may cause upward pressure on our current caseload forecast. VR is also actively working on to timely transition of clients through the service sequence process which was hindered due to limited access to students in face-to-face interaction at schools. Additionally, VR is partnering with community Colleges to hire Career Coaches to support individuals

identified as needing VR support and work to focus on enhanced certification program which could lead to higher paying and more secure employment. VR is also exploring a collaboration with Self-Sufficiency's SNAP Training and Employment Program (STEP). These outreach programs may over time bring more new clients into the VR program than is currently projected." (citation: OFRA "Fall 2023 ODHS/OHA Caseload Forecast" report pages 36-38.

(3) The use of funds reserved for innovation and expansion activities (sections 101(a)(18) and 101(a)(23) of the Rehabilitation Act) (e.g., SRC, SILC).

**Agency response:**

VR utilizes a portion of our funds every year to provide innovative activities that allows us to expand our services in partnership with the SRC and SILC.

Over the reporting period, the Oregon State Rehabilitation Council (SRC) partnered with the VR program in several ways, to uplift the voice of consumers of the program.

- The Consumer Satisfaction Survey was reimplemented. This started with an “in-house” attempt that led to council members realizing that more meaningful results would be received if it was done thorough a third party who could disseminate the survey and provide an analysis of the results. The SRC and VR contracted with Western Oregon University to establish a baseline understanding of how VR clients were feeling about services. The results of this survey were used in providing evaluations and inputs for the state plan and matched other results from other tools around areas of success and areas that needed improvements.
- One of the SRC subcommittees developed and distributed a one-time Vendor Survey to learn about their needs and challenges so that VR could increase and retain CRPs.
- Many outreach efforts to add membership and representation of diverse populations of OR on the council. This included inviting more people to SRC meetings, attending other related conferences and meetings and spending time building relationships among communities served in VR.
- Over the last few years, the SRC held virtual meetings and were able to get back to in person Quarterly meetings in May of 2023. SRC members attended the VR in-service conference and combined the third quarterly meeting to happen at the same time to save travel time and dollars, allowing council members to attend and present at the in-service as well as network with staff and other community partners.
  - Innovation: the SRC's Evaluation and Recommendation Subcommittee spent countless hours on reviewing and analyzing relevant data from the program and results of the surveys in order to provide recommendations to increase and improve services for clients.
  - The Legislative workgroup collaborated with other Oregon Department of Human Services (ODHS) programs to hold events for the National Disability Employment Awareness Month in October where Oregon House and Senate law makers were

invited to learn about how ODHS programs support people with disabilities around employment and hear success stories.

Over the reporting period, the State Independent Living Council (SILC) was provided \$295,587 in federal Innovation and Expansion funds, which were matched with \$80,000 in state general funds to support the SILC, consistent with the Act. The Council collaborated with the VR program on various efforts, supporting distribution of VR program information to the disability community. The SILC's Executive Director also served on the SRC and certain of its subcommittees.

Specific to the Independent Living program, the SILC's collaboration with VR included efforts to support improvement of Center for Independent Living and VR partnerships, including those focusing on transition services for youth, which is a core service of the Independent Living program. Opportunities to pursue a [Disability Innovation Fund - Pathways to Partnerships](#) grant were explored, though none of the programs eligible to apply on the State's behalf had current capacity to administer the grant due to heavy workloads. The SILC worked with the Administration for Community Living to assist in communicating with the Rehabilitation Services Administration regarding possible other eligible grantees. Centers for Independent Living continue to consider ways a project similar to what they proposed to do under the DIF grant could be supported.

Funding of the SILC also supported two goals of the State Plan for Independent Living.

- Development of a statewide initiative to facilitate youth leadership and training. This goal is still in progress. The SILC explored approaches used in other states for youth initiatives, expanded outreach to contacts able to help make connections with youth across the state, and planned for hiring of SILC staff to lead a youth initiative within the Independent Living program to prepare for implementation.
- Providing a statewide training conference for Oregon's Independent Living network. This was completed, with plans underway for a future conference. This was a highly valued opportunity by participants including the Independent Living program service providers and the SILC. The conference included:
  - Sharing in small groups with those in similar jobs (Work Incentive Counselors, Independent Living Specialists, administrators, board members, etc.)
  - Training regarding:
    - innovative services
    - consistent data collection practices
    - history of the Independent Living movement and the ADA
    - behavior health policy systems change
    - methods for collaboration with community colleges to foster students with disabilities as advocates
      - Innovative ways to serve youth with disabilities and build community

**(e) Supported Employment Services, Distribution of Title VI Funds, and Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.**

- (1) Acceptance of title VI funds:
  - (A) VR agency requests to receive title VI funds.
  - (B) VR agency does NOT elect to receive title VI funds and understands that supported employment services must still be provided under title I.

**Agency response:**

The VR agency requests to receive title VI supported employment funds.

- (2) If the VR agency has elected to receive title VI funds, Section 606(b)(3) of the Rehabilitation Act requires VR agencies to include specific goals and priorities with respect to the distribution of title VI funds received under section 603 of the Rehabilitation Act for the provision of supported employment services. Describe the use of title VI funds and how they will be used in meeting the goals and priorities of the Supported Employment program.

**Agency response:**

Oregon VR's Title VI, Supported Employment Funds are \$506,400 for the biennium. At a current cost per case of approximately \$4,990 we will be able provide services to approximately 101 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.

- (3) Supported employment services may be provided with title 1 or title VI funds following placement of individuals with the most significant disabilities in employment. In accordance with section 101(a)(22) and section 606(b)(3) of the Rehabilitation Act, describe 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; and the timing of transition to extended services.

**Agency response:**

Extended services are ongoing support services and other appropriate services identified, needed, and agreed upon in the IPE. Extended services are provided once the participant is stable on the job and no longer needs VR services to maintain employment.

- An extended service provider is the entity that provides extended services when VR services are no longer needed for job performance.
- An example of extended services would be job coaching services paid for by Medicaid waiver services through county developmental disability programs, brokerages, or mental health agency funding.

Note: This was previously termed “long-term support services” through VR.

Resources for extended services could include, but are not limited to:

- County developmental disability services
- Mental health agency funding
- Social Security work incentives
- Coworker natural support systems
- Family members, friends
- Oregon income cap trust fund

Extended services may only be funded by VR for youth with the most significant disabilities for up to four years, or until the individual turns 25 and no longer meets the definition of a youth with a most significant disability, whichever comes first.

For example, a youth with a most significant disability who requires extended services but is not eligible for Medicaid Waiver services is not eligible for extended services when they are age 25. The counselor must identify another source of extended services for the youth to ensure there is no interruption of services.

Note: VR may not provide extended services to an individual who is not a youth with a most significant disability.

The VR counselor coordinates with the appropriate case management entity to transition the client to extended supports.

Any youth considering the possibility of seeking employment in a sub-minimum wage setting must receive documented counseling in accordance with all provisions outlined in [Section 511 of the Rehabilitation Act](#).

VR works closely with other State agencies whose populations benefit from VR Supported Employment (SE) Services. VR, the Department of Education, and the Office of Developmental Disability Services work together with the State’s Employment First program to ensure that individuals who experience Intellectual and/or Developmental Disabilities 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 Oregon Health Authority's Behavioral Health Programs to ensure that individuals accessing VR's services who are also working with Mental Health Programs across the state, get access to quality Individualized Placement and Support (IPS) Services.

VR continues our collaboration with the Oregon Supported Employment Center for Excellence (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 Oregon.

In 2022, VR amended the 2018 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 handoffs occur between agencies. VR currently has more than 140 providers under contract through our amended Job Placement Services Contract.

VR continues to systematically identify areas of the state where capacity issues exist to assure that training is available in those areas. Recruitment of providers in these areas continues to be a priority moving forward. VR actively partners in an Oregon Department of Human Services (ODHS) Rural Stakeholders group designed to explore opportunities to expand service delivery in rural Oregon as well as participating in the ODHS Native American Policy Workgroup to increase service delivery and cooperation with the Nine Native American Tribes in Oregon.

Oregon VR has also established a higher service categorization tier for those VR clients identified as having the most significant disabilities. This tier includes paying providers an increased rate for providing job development services as well as other incentives for serving this population. VR and ODDS, in cooperation with the Oregon Home Care Commission, continue to develop job coach capacity through the use of Personal Care Attendants.

- (4) Sections 101(a)(22) and 606(b)(4) of the Rehabilitation Act require the VR agency to describe efforts to identify and arrange, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services. The description must include extended services, as applicable, to individuals with the most significant disabilities, including the provision of extended services to youth with the most significant disabilities in accordance with 34 CFR 363.4(a) and 34 CFR 361.5(c)(19)(v).

**Agency response:**

VR works closely with other State agencies whose populations benefit from VR Supported Employment (SE) Services. VR, the Department of Education, and the Office of Developmental Disability Services work together with the State's Employment First program to ensure that individuals who experience Intellectual and/or Developmental Disabilities receive coordinated and sequenced services that meet their employment needs. This multi-agency collaboration operates under the guidance of Executive Order 15-01, 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 continues to guide the close relationship of the two agencies. VR has a close relationship with 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 quality Individualized Placement and Support (IPS) Services, when appropriate. VR continues our collaboration with the Oregon Supported Employment Center for Excellence (OSECE) who oversees the fidelity of mental health 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. 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 140 providers under contract through our Job Placement Services Contract. VR continues to systematically identify areas of the state where capacity issues exist to ensure training is available. Recruitment of providers continues to be a priority moving forward. 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.

**(f) Annual Estimates.** Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 CFR § 361.29(b), annual estimates must include the following projections:

(1) Estimates for next Federal fiscal year—

(A) VR Program; and

**Agency response:**

<b>Priority Category (if applicable)</b>	<b>Number of Individuals Eligible for Services</b>	<b>Number of Eligible Individuals Expected to Receive Services under VR Program</b>	<b>Costs of Services using Title I Funds</b>	<b>Number of Eligible Individuals Not Receiving Services (if applicable)</b>
Priority 3 – Not Significantly Disabled	1,354	954	\$3,888,052.04	0
Priority 2 – Significantly Disabled	1,765	1,205	\$4,825,767.82	0
Priority 1 – Most Significantly Disabled	6,741	4,853	\$25,274,403.02	0

**(B) Supported Employment Program.**

**Agency response:**

<b>Priority Category (if applicable)</b>	<b>Number of Individuals Eligible for Services</b>	<b>Number of Eligible Individuals Expected to Receive Services under Supported Employment Program</b>	<b>Costs of Services using Title I and Title VI Funds</b>	<b>Number of Eligible Individuals Not Receiving Services (if applicable)</b>
Priority 1 – Most Significantly Disabled	3,263	2,535	\$506,400	0

**(g) Order of Selection.**

[check box] The VR agency is **not** implementing an order of selection and all eligible individuals will be served.

[check box] The VR agency is implementing an order of selection with one or more categories closed.

**Agency Response:**

The VR agency is not implementing an order of selection and all eligible individuals will be served.

\* VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

Pursuant to section 101(a)(5) of the Rehabilitation Act, this description must be amended when the VR agency determines, based on the annual estimates described in description (f), that VR services cannot be provided to all eligible individuals with disabilities in the State who apply for and are determined eligible for services.

(1) For VR agencies that have defined priority categories describe—

(A) The justification for the order;  
[text box]

(B) The order (priority categories) to be followed in selecting eligible individuals to be provided VR services ensuring that individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and  
[text box]

(C) The VR agency's goals for serving individuals in each priority category, including how the agency will assist eligible individuals assigned to closed priority categories with information and referral, the method in which the VR agency will manage waiting lists, and the projected timelines for opening priority categories. NOTE: Priority categories are considered open when all individuals in the priority category may be served.  
[text box]

(2) Has the VR agency elected to serve eligible individuals outside of the order of selection who require specific services or equipment to maintain employment?  
[check box] Yes  
[check box] No

**(h) Waiver of Statewideness.** The State plan shall be in effect in all political subdivisions of the State, however, the Commissioner of the Rehabilitation Services Administration (Commissioner)

may waive compliance with this requirement in accordance with section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 CFR 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 CFR 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate “not applicable.”

**Agency response:**

Not applicable.

**(i) Comprehensive System of Personnel Development.** In accordance with the requirements in section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency’s comprehensive system of personnel development, which shall include a description of the procedures and activities the VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

- (1) Analysis of current personnel and projected personnel needs including—
  - (A) The number and type of personnel that are employed by the VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to clients;
  - (B) The number of personnel currently needed by the VR agency to provide VR services, broken down by personnel category; and
  - (C) Projections of the number of personnel, broken down by personnel category, who will be needed by the VR 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.

**Agency response:**

Personnel Category	Number of Personnel Employed	Number of Personnel Currently Needed	Projected Number of Personnel Needed in 5 Years
VR Program Total Positions	275	20	59

<b>Personnel Category</b>	<b>Number of Personnel Employed</b>	<b>Number of Personnel Currently Needed</b>	<b>Projected Number of Personnel Needed in 5 Years</b>
VR Counselors	129	13	31
VR Specialists	16	5	3
Pre-ETS Coordinators/Transition Service Coordinators/ Youth Contract Coordinator	10	1	1
Human Services Assistants/Office Assistants	68	9	25
Workforce and Business Staff	13	1	3
Administrative Managers (Program and Direct Service)	10	0	0
Central Administration Staff	25	3	4

(D) Ratio of qualified VR counselors to clients:

**Agency response:**

The total 129 budgeted VR counselors and 16 budgeted VR Specialists (145 total) provided necessary service delivery to clients during the following state fiscal years:

SFY 2020: 14,984

- Staffing Ratio: 1:103

SFY 2021: 12,240

- Staffing Ratio: 1:84

SFY 2022: 11,695

- Staffing Ratio:1:81

SFY 2023: 12,657 (Projected)

- Staffing Ratio: 1:87

(E) Projected number of individuals to be served in 5 years:

**Agency response:**

The total VR caseload forecast projects an average of 8,956 clients per month in 2023-25 biennium, which is slightly higher than the Spring 2023 forecast. The total VR caseload will average to 9,821 clients per month in 2025-27.

(2) Data and information on personnel preparation and development, recruitment and retention, and staff development, including the following:

(A) A list of the institutions of higher education in the State that are preparing VR professionals, by type of program; the number of students enrolled at each of those institutions, broken down by type of program; and 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.

**Agency response:**

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
Idaho State University	MS in Clinical Rehabilitation Counseling	20	5
Portland State University	MS in Clinical Rehabilitation Counseling	36	10
Portland State University	Graduate Certificate in Orientation and Mobility	29	19
Western Oregon University	MS in Rehabilitation Counseling	47	12
Western Washington University	MA in Rehabilitation Counseling	36	14

(B) The VR agency's plan for recruitment, preparation and retention of qualified personnel, which addresses the current and projected needs for qualified personnel; and the coordination and facilitation of efforts between the VR agency 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.

**Agency response:**

Oregon VR continues to work closely with the graduate rehabilitation counseling programs at Western Oregon University and Portland State University as well as other graduate rehabilitation counseling programs nationwide to attract a diverse, highly qualified applicant pool to work for our program.

These recruitment efforts include reaching out to interested graduate programs to provide practicum and internship sites for students working their way through the program. In the current 2023-24 academic year, Oregon VR received 17 applications for internships from students representing 9 graduate academic programs; 13 were offered positions as interns which has resulted in 9 students currently placed in field offices around the state working as Vocational Rehabilitation Counselor interns.

We have begun accepting applications for the 2024-25 academic year and have already received 13 applications from 3 graduate academic programs. So far, we have extended 10 offers for internship with 8 students responding in agreement to intern with us next academic year. We anticipate receiving more applications and placements as the year progresses. The VR Director's Stipend Program was discontinued in 2023 and has been replaced by paid temporary Vocational Rehabilitation Counselor Intern positions. This was done to benefit the student in having an employment relationship directly with our program which removed a lengthy contracts process between our program and our two in-state universities.

This has been positively received by our university partners and students. By creating temporary positions, we have been able to extend the opportunity to have paid positions available to all students who intern with our program. Previously the VR Director's Stipend Program was only available to students in our two in-state Rehabilitation Counseling programs. Current universities we are working in collaborative partnership with include:

- Idaho State University
- Pacific University
- Portland State University (PSU)
- San Diego State University (SDSU)
- Southern Oregon University
- State University of New York at Buffalo
- Texas Tech University Health Science Center (TTUSHC)
- University of Alabama
- University of Massachusetts at Boston (UMB)
- Western Oregon University (WOU)
- Western Washington University

Our program is designed to attract and support interns, as well as develop a rich and diverse pool of applicants for VRC positions in the Oregon VR program. During this reporting period, VR

was able to provide the VR Director's Stipend to 5 graduate interns during the 2022-23 academic year with a total expenditure of \$72,000. This included 3 WOU students at a cost of \$43,200 and two PSU students at a cost of \$28,800.

Additionally, 3 interns did not receive the stipend because they were able to obtain full-time permanent VRC employment prior to starting internship and 1 who was a student from a graduate program without the VR Director's Stipend. Of these 9 interns 50% reported being a part of a BIPOC community and 62.5% disclosed experiencing disability.

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.

During the current 2023-24 academic year, we have begun spending a total cost of \$85,680 committed cost of \$10,710 per student at \$17.85 per hour for students for a total of 8 students. Pay equity does allow students with additional training and work experience to receive a higher amount. The students per school are as follows: 3 from PSU, 2 from WOU and one student each from SDSU, TTUSHC, and UB. Of these 8 interns 50% reported being a part of a BIPOC community and 75% disclosed experiencing disability.

VR staff members continue to serve on Rehabilitation Counselor Education Advisory Councils for programs in the region (WWU, PSU, and WOU). Additionally, several program managers and VRCs are participating in graduate level coursework and in the mock interviews conducted with students. The VR Internship Coordinator, VR managers and several VRCs have also been involved in the selection process for incoming students at WOU and PSU for the past two years.

During the next 2024-25 academic year, we have planned a total of \$149,940 committed cost for 14 students with the same cost per student, hourly rate, and pay equity process as the 2023-24 academic year.

Currently the 8 students from PSU and WOU who have secured internship with us will be receiving these funds with 6 remaining slots for additional interns as applications come in throughout the year. Of these 8 future interns 50% reported being a part of a BIPOC community and 75% disclosed experiencing disability.

- (C) Description of staff development policies, procedures, and activities that ensure all personnel employed by the VR agency receive appropriate and adequate training and continuing education for professionals and paraprofessionals:
  - i. 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

- ii. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to VR agency professionals and paraprofessionals and for providing training regarding the amendments to the Rehabilitation Act made by the Workforce Innovation and Opportunity Act.

**Agency response:**

All Oregon VR employees are provided with the supervision and training necessary to ensure the delivery of quality VR services. In addition to direct supervisory practices.

The program has entered-into training contracts with Cornell University to provide ongoing clinical, foundational, and developmental training to ensure professional staff remain current on best practices and the latest developments in rehabilitation counseling.

OVR has also entered into intensive technical assistance training agreements with all three Vocational Rehabilitation Technical Assistance Centers. These agreements were completed in order to ensure compliance with all required training and staff development policies and procedures, and to offer increased opportunities for staff growth and advancement.

(3) Description of VR agency policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that VR agency professional and paraprofessional personnel are adequately trained and prepared,—

- (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

**Agency response:**

Oregon VR utilizes an established set of standards to evaluate and select Vocational Rehabilitation Counselors (VRC). These standards are based on a modified version of standards utilized by the State Workers' Compensation Division (WCD). The State of Oregon's VRC classification is shared by WCD, the Oregon State Hospital, the Oregon Commission for the Blind, and VR.

The Oregon VRC classification requires that VRCs possess at a minimum:

- A master's degree in Rehabilitation Counseling; OR
- Certification from either the Commission on Rehabilitation Counselor Certification as a Certified Rehabilitation Counselor (CRC), or a 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 twelve 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 work experience substitute for the bachelor's degree requirement.
- VR continues to have a goal that all employees classified as VRCs 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 VRC candidates with an appropriate bachelor's degree and related work experience may be hired.

(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.

**Agency response:**

VR continues to support to staff who have attained the Certified Rehabilitation Counselor (CRC) credential through not only ensuring that all eligible training sessions are pre-approved for CRC 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. 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 the Administration Unit. The program expects that all staff members will participate in appropriate professional development activities and continuing education opportunities. This expectation 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 have been developed with the regional economists and workforce analysts employed by the Oregon Employment Departments 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 LWDBs so that VR staff have an increased understanding of their local sector strategies.

- (4) Method(s) the VR agency uses to ensure that personnel 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.

**Agency response:**

**Hiring and retaining staff:** Oregon VR focuses on hiring and retaining staff proficient in languages other than English to meet the communication needs of applicants and eligible individuals. In January 2024, VR had 21 staff who have passed mandatory language proficiency testing in American Sign Language, Amharic, Bosnian, Persian, Serbian-Croatian, and Spanish. In specific geographic areas and for specific caseloads, VR engages in targeted recruiting for job applicants with specific language skills. Staff who took proficiency testing, but did not pass the first attempt, may study and receive supports to improve skills for a second attempt after at least six months of study and practice.

**Contracted services:** VR staff who are not fluent in the native language of a participant have access to, and training in, the use of approved contractors approved for onsite, remote, and telephonic services. Contracted language access services include spoken language interpreting, ASL interpreting, and real-time captioning services.

**Document translation:** To further support the communicate needs of participants, VR translated all client-facing forms and outreach materials in five common languages: Arabic, Russian, Simplified Chinese, Spanish, and Vietnamese. Content of program materials are written at an eighth grade reading level in plain language. We are working to implement rapid client-specific translations for documents such as Individualized Plans for Employment and Notice of Proposed Action letters. All documents are available in alternate formats and languages upon request. Client-facing forms, outreach materials and written messages include this boilerplate accessibility language with a call to action for making a request: "You can get this document in other languages, large print, braille or a format you prefer free of charge."

**Accessible meetings:** VR led the agency throughout the COVID-19 pandemic in advocacy and testing of language access services for virtual meetings. VR, other programs in Oregon Department of Human Services, Oregon Health Authority, and the Office of Information Systems

engaged with the Microsoft Accessibility Team to ensure the software platform is accessible for individuals who use ASL interpreters and Communication Access Real-time Translation (CART) services. VR staff have access to Zoom for Government to meet the needs of Deaf and Hard of Hearing participants and other Oregonians with disabilities who require ASL or text-based accommodations until accessibility in Microsoft has been achieved.

**Community of practice:** Spanish-speaking VR counselors began meeting in 2023 to improve communications, services and outreach to Spanish-speaking communities. This group is modeled on VR's long-standing Rehabilitation Counseling with Deaf and Hard of Hearing community of practice.

- (5) 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.

**Agency response:**

Oregon VR coordinates personnel development along with Oregon Department of Education as outlined in our combined Cooperative Agreement between Oregon's Department of Human Services, Department of Developmental Disabilities, Commission for the Blind, and Department of Education. This Agreement is used as the foundation of shared goals outlined in Oregon's Transition Collaborative's annual plan. The Transition Collaborative is made up of members from Vocational Rehabilitation, Department of Education, Department of Developmental Disabilities, Commission for the Blind, Career Technical Education, and our FACT (Oregon's parent training organization). This team creates shared transition-related goals that each of our organization contributes to. The work of our Transition Collaborative is carried out by subject matter experts within our organizations or through contract services.

**COOPERATION, COLLABORATION, AND COORDINATION (Section 101(a)(11) of the Rehabilitation Act)**

- (j) **Coordination with Education Officials.** In accordance with the requirements in section 101(a)(11)(D) of the Rehabilitation Act—

- (1) Describe plans, policies, and procedures for coordination between the designated State agency and education officials responsible for the public education of students with disabilities, that are designed to facilitate the transition of the students with disabilities from the receipt of educational services in school to the receipt of vocational rehabilitation services, including pre-employment transition services.

**Agency response:**

**Plans:** The Oregon Transition Collaborative is a statewide group made up of representatives from Vocational Rehabilitation, Department of Education, Commission for the Blind, Department of Developmental Disabilities, Career Technical Education, and FACT (parent training organization) that creates and implements an annual plan that addresses shared transition topics intended to facilitate a more streamlined and accessible process of transitioning from school-aged into adult services for youth and families.

**Policies:** Both Oregon Administrative Rule Division 150 – Transition Services, and Vocational Rehabilitation's policies explicitly address the need for coordination between agencies to ensure access to transition services without duplication or reduction of responsibility from any one agency.

The OARs address:

- 582-150-0002 Purpose.
- 582-150-0005 Definitions.
- 582-150-0015 General Provisions for Students and Youth with Disabilities in Transition.
- 582-150-0030 Pre-employment transition services.
- 582-150-0040 Program application and eligibility for students and youth for individualized transition services.
- 582-150-0045 Individualized plan for employment (IPE) for student or youth.
- 582-150-0050 Group Transition Services.
- 582-150-0065 Required Program service records for students receiving pre-employment transition or transition coordination.
- 582-150-0070 Client Assistance Program information.
- 582-150-0070 Use of funds reserved for preemployment transition services.
- 582-150-0075 Limitations.
- 582-150-0080 Restrictions.
- 582-150-0100 Reservation for pre-employment transition services.
- OAR 582-150-0200 Pre-employment services rate setting.

VR's Youth Services Policy addresses:

- Definitions specific to student and youth with Disabilities
- Pre-Employment Transition Services (pre-ETS)
- Pre-ETS required activities
- Who can receive pre-ETS
- Pre-ETS coordination
- Frequency of contact for students receiving pre-ETS
- Transition services
- Youth with disabilities no longer in school
- Contracted services for youth in transition

- Individualized Plan for Employment (IPE) for students or youth with disabilities
- Employment outcome — youth IPE content

**Procedures:** Oregon VR coordinates personnel development along with Oregon Department of Education as outlined in our combined Cooperative Agreement between Oregon's Department of Human Services, Department of Developmental Disabilities, Commission for the Blind, and Department of Education. This Agreement is used as the foundation of shared goals outlined in Oregon's Transition Collaborative's annual plan. The Transition Collaborative is made up of members from Vocational Rehabilitation, Department of Education, Department of Developmental Disabilities, Commission for the Blind, Career Technical Education, and our FACT (Oregon's parent training organization). This team creates shared transition-related goals that each of our organization contributes to. The work of our Transition Collaborative is carried out by subject matter experts within our organizations or through contract services through a series of conferences, training events, regional collaborative meetings, and side-by-side technical assistance.

- (2) Describe the current status and scope of the formal interagency agreement between the VR agency and the State educational agency. Consistent with the requirements of the formal interagency agreement pursuant to 34 CFR 361.22(b), provide, at a minimum, the following information about the agreement:
  - (A) Consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services and other vocational rehabilitation services;
  - (B) Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their individualized education programs (IEPs) under section 614(d) of the Individuals with Disabilities Education Act;
  - (C) The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and pre-employment transition services;
  - (D) Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must 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;

- (E) Coordination necessary to satisfy documentation requirements set forth in 34 CFR part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and
- (F) Assurance that, in accordance with 34 CFR 397.31, neither the SEA nor the local educational agency will enter into a contract or other arrangement with an entity, as defined in 34 CFR 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.

**Agency response:**

The current formal Cooperative Agreement between Oregon Departments of Human Services (Vocational Rehabilitation), Education, Developmental Disabilities, and Commission for the Blind is active until June 30, 2028. Within this Agreement, all parties mutually agree to the following:

- To 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 postsecondary education.
- To foster innovation in transition program design and service delivery strategies between VR, OCB, ODDS and LEA.
- To utilize a common message when sharing information to local VR, OCB, DD offices and LEA's.
- To post this agreement on their respective websites (or in a location readily available to agency staff).
- To 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.
- To develop and provide common trainings and professional development opportunities to improve transition and employment results.
- To provide or post a copy of this Agreement to the agency websites as a public document.
- To mutually develop and distribute notices, memorandums, and other information regarding transition to agency and community partners.
- To give timely notice to agency and community partners of all proposed changes to rule or policy that relate to youth transition.
- To collaborate toward meeting the unique needs of LEAs, VR, OCB, and DD offices, and facilitate seamless transition for students with disabilities from a FAPE to the provision of vocational rehabilitation services.
- To assign qualified staff positions to facilitate and support linkages among transition activities and outcomes provided by LEAs, VR, ODDS, and OCB.

- To identify criteria for determining and assigning the financial and programmatic roles and responsibilities of each agency for the provision of pre-employment transition services and transition services to students with disabilities. The criteria may include:
  - Purpose of the service;
  - Customary service; and
  - Eligibility for services
- To establish a grievance procedure to resolve disputes between VR, OCB, SEA, LEA, or ODDS, as appropriate, as well as procedures to resolve disputes between an individual with a disability and the entities specified above, and information about the Client Assistance Program.

It is the goal that VR staff attend or provide information to students and families at IEP meetings, or other transition planning meetings. At the same time, in order to maximize the capacity of our statewide network, and using the communication channels of Oregon's Transition Collaborative, each partner agency informs one another of updates to policies, procedures, new initiatives and priorities, and most critically the initial points of access. Partner agencies plan and participate in collective shared learning events twice each year so that each agency has accurate and current information to share with students, families, community partners, and respective agency staff across our multiple settings. Collectively, we commit to making clear the accessible points of contact who are available to provide so that we are all able to share the basic information and route our consumers to each agency with specific questions.

Oregon Vocational Rehabilitation collaborates and coordinates with our educational partners in many ways. VR provides information on Pre-ETS to the state Department of Education and local education entities to distribute to students, family members, guardians or their representatives. VR staff attend meetings for the development of an Individualized Education Plan (IEP) when given timely notice of invitation, with appropriate consent and as resources allow. As part of our partnership, education staff provide information and referrals regarding VR and ODDS services. It is a shared goal that each of our agencies develop respective plans (Individual Plans for Employment, Individual Education Plans, Individual Service Plans) which strategically align to maximize services without duplication for our shared youth.

Oregon's coordinated transition services: VR Pre-employment transition services are the earliest set of services for students with disabilities who are eligible or potentially eligible for Vocational Rehabilitation (VR) services. These services are designed to be short-term in nature, based on the student's needs, and help students identify their career interests. Designed to be an early start at job exploration for students with disabilities. Services include Job Exploration Counseling, Work Based Learning Experiences, Counseling on Postsecondary Opportunities, Workplace Readiness Training and Instruction in Self Advocacy. Population served are ages 14-21, enrolled in school, and eligible or potentially eligible for VR. Funding source is 15% reserved from annual VR program's federal allotment.

VR Transition Services are outcome-oriented services that promote movement from school to post-school activities, including postsecondary education, vocational training, and an employment outcome in competitive integrated employment or supported employment, including customized employment. These services provide for further development and pursuit of career interests with postsecondary education, vocational training, job search, job placement, job retention, job follow-up and job follow-along services. Services may include Job Development / Job Coaching / clothing / course fees / license fees / follow-up and follow along services. Pre-ETS can be a transition service when students have an active Individual Plan for Employment with VR. Population served are ages 14-24, in plan with VR. This can include out of school youth, which are not included in the provision of Pre-ETS. Funding source is 110 or other funds; state agencies cannot charge against the 15% reserve unless the Transition Service is a Pre-ETS.

VR holds the financial responsibility for both of these services, and are provided by VR staff, or through VR authorized contracts.

- VR staff include Pre-ETS Coordinator, Youth Service Coordinators, and VR Counselors.
- Contracted staff include Youth Transition Coordinators and Pre-ETS Support Specialists.

IDEA Transition Services are the financial responsibility of ODE and LEAs, and represent a coordinated set of activities designed to be results-oriented process, improving the academic and functional achievement movement from school to post-school activities, including postsecondary education, vocational education, integrated employment and independent living. The purposes of IDEA include ensuring that all children with disabilities have available to them a free appropriate public education (FAPE) that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment and independent living. Transition services under IDEA refers to a coordinated set of activities for a child with a disability and is based on instruction, related services, community experiences, development of employment, other post-school adult living. Funding for Special Education in Oregon is provided through state and federal funding sources.

Oregon Developmental Disability Services (ODDS) hold the financial responsibility to provide long term Job Coaching, Benefits Counseling, Employment Path services, Small Group, Day Support Activities, On the Job Attendant Care, Career Development Planning, Transportation and Professional Behavior Services. In addition, services to youth may include Pre-employment support for; Long term job coaching. In certain circumstances, other services as needed to complement services from other funding streams (e.g., transportation, professional behavior services, attendant care/ personal assistance). Population served are Individuals with Intellectual and Developmental Disabilities. Funding source is Medicaid and ODDS-funded Home and Community-Based Long Term Care Services.

Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services include the following:

- We promote outreach to and identification of students with disabilities who are in need of transition services or transition planning (including Pre-ETS) beginning as early as 14 years old. Outreach to these students includes a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to potentially eligible and 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.
- VR informs ODE of policies or procedural changes that may impact the eligibility of students with disabilities for VR and OCB services and the provision of services, so that ODE can disseminate such material to LEAs and the State Directors of Special Education.
- VR and OCB inform and refer students to Tribal VR in the identified service delivery area to receive culturally relevant services so the student can make an informed choice about the services that they are eligible for and can receive. VR and OCB inform eligible students that they have the choice to work with VR, TVR, or OCB separately or collectively.
- Upon request from the LEA or ODE, VR provides technical assistance on how VR identifies potentially eligible students for services from VR/OCB and how to work with VR/OCB in the provision of transition services including pre-employment transition services.
- VR determines eligibility for VR/OCB services and provides vocational rehabilitation services to eligible school-aged students with disabilities when referred by the LEAs.
- Upon request, VR works with ODE, ODDS and other agencies through a variety of training activities to identify and plan transition strategies for students with disabilities requiring long-term support after VR/OCB time-limited services.
- VR inform LEAs, students and their parents of the availability of the Client Assistance Program, a dispute resolution program available to VR/OCB clients and participants in rehabilitation programs receiving federal funding.
- VR provides training to all VR Counselors and qualified staff on their role in providing outreach activities to students with disabilities to include those served in special education, served under Section 504, and those served in general education.
- VR provides 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.
- Upon request, VR participates in transition planning with schools to facilitate the development of IEPs for students with disabilities.
- VR assure that IPEs are developed for students within 90 days of being determined eligible for vocational rehabilitation services.
- VR/OCB office staff are encouraged to collaborate in local community planning and implementation efforts that are focused on the transition of students with disabilities from school to postsecondary outcomes.

- VR/OCB provide one assigned VRC to serve as point of contact for each LEA around the state.
- Upon request, VR provides information to the ODE State Advisory Council on Special Education to assist in the development of the Council's annual report to the Superintendent of Public Instruction.

As of 07/01/2023, Oregon prohibits use of subminimum wage employment. Oregon VR has developed collaborative agreements with the Office of Developmental Disabilities to monitor all subminimum wage employers. This partnership identifies all statewide entities authorized to pay subminimum wages under a Section 14C certificate. As part of this agreement, any entity serving individuals through the use of subminimum wages, must provide the VR program opportunities to provide annual counseling and training to any employee making subminimum wage, as well as providing space on site for this counseling to occur.

The VR program has contracted with a statewide vendor to perform all required counseling for each individual earning subminimum wages, on at least an annual basis, and to provide counseling and guidance to each individual about opportunities to earn minimum wage as well as facilitating an appointment at the closest available state VR office should the individual desire additional information.

Transition services and pre-employment services will not occur in settings where subminimum wages are paid under a 14c certificate (Rehabilitation Act, Oregon Revised Statutes 653.033). Oregon Revised Statute 653.033 eliminated all subminimum wage options effective June 30th, 2023.

After June 30, 2023, an employer who may have been authorized to employ individuals with disabilities at subminimum wage pursuant to a special certificate issued under 29 U.S.C. 2 14(c) or in accordance with rules under ORS 653.030 or through the Oregon Department of Human Services, may not employ or agree to employ individuals with disabilities at a rate lower than the hourly rate as established under ORS 653.025 (Minimum wage rate).

This legislative mandate effectively removed the option for subminimum wage employment statewide after the 30th of June 2023. Prior to this law going into effect, a phaseout of subminimum wage employment statewide had been put into effective as part of the Lane v. Brown Settlement agreement, with all employees earning subminimum wage being monitored by both the VR Program and the Oregon Office of Developmental Disabilities (ODDS). The Oregon Department of Education was an active participant in the Lane v. Brown Settlement and was fully engaged in partnership with VR and ODDS to identify, reduce and to provide education for students and youth participating in subminimum wage employment prior the elimination of subminimum wage statewide on 30 June 2023.

**(k) Coordination with Employers.** In accordance with the requirements in section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with

employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.

**Agency response:**

**VR Services**

VR knows that given the needs of our clients and business community; a robust employer engagement model is required to be successful. VR counselors, along with a dedicated VR workforce and business team, are providing education and resources to employers to assist in meeting their individual employment demands through hiring qualified individuals with disabilities. In addition, VR contracts with qualified job placement service providers to identify individual employment, assessment, and training opportunities for those who require these customized services to become gainfully employed.

VR is fully integrated into the Oregon workforce system. By leveraging opportunities with other workforce partners, VR increases competitive integrated employment opportunities for Oregonians with disabilities.

VR will:

- Engage the workforce development system and the business community via intentional, targeted outreach, relationship and partnership building
- Coordinate with Oregon Commission for the Blind (OCB) for services and training to businesses
- Engage with the National Employment Team (NET) for a unified approach to working with business customers
- Collaborate with the Employment Department's Business Services Team members around the state on joint services to business
- Partner with the local workforce development boards (LWDB) to coordinate services and leverage resources
- Research and communicate opportunities for clients including on-the-job training (OJT), paid work experiences, internships, and apprenticeships with businesses
- Participate in and coordinate local employer recruitment events and career fairs
- Contract with providers to facilitate employment events and activities for individuals with disabilities
- Provide training to contracted job placement and partner providers
- Leverage MOUs with local agencies regarding employment and career exploration opportunities
- Provide training and consultation to business on disability awareness and accommodations in the workplace
- Identify and engage external organizations who may not currently be a workforce partner

- Participate in local area business events to increase disability awareness and knowledge of VR services
- Engage businesses by promoting local area internships for individuals with disabilities
- Resource on non-degree credentials, including certificates, industry certifications, apprenticeship certificates, and occupational licenses with CTE, workforce, and businesses to build an inclusive and skilled future workforce
- Leverage labor market information (LMI) in designing strategy for employer and industry engagement
- Inform business partners on hiring incentives and resources to support businesses employing, supporting, retaining and promoting qualified talent with disabilities
- Utilize data collection methods to track and guide business engagement and services to business

**Services to Business include but are not limited to:**

- Connection to skilled talent to address workforce needs
- Tips, tools, information, and resources to promote disability inclusion in the workplace
- Training on a variety of topics related to disability in the workplace
- Partnering on all-ability hiring events
- Empowering businesses through professional networking and educational opportunities
- Visit VR's Services to Business webpage for additional information:  
<https://www.oregon.gov/odhs/vr/Pages/business.aspx>

**(I) Interagency Cooperation with Other Agencies.** In accordance with the requirements in section 101(a)(11)(C) and (K), 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 to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

- (1) State programs (designate lead agency(ies) and implementing entity(ies)) carried out under section 4 of the Assistive Technology Act of 1998;

**Agency response:**

Access Technologies, Inc. (ATI), serves as the Implementing Entity for the Oregon Statewide 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 ODHS). This administrative agreement sets forth the 10 activities that must be conducted by ATI on behalf of ODHS and the system of oversight to be provided by ATI's Board of Directors. ODHS 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.

- (2) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;

**Agency response:**

Oregon Vocational Rehabilitation has not entered into agreements with programs carried out by the Under Secretary for Rural Development of the U.S. Department of Agriculture.

- (3) Non-educational agencies serving out-of-school youth;

**Agency response:**

In Oregon the Oregon Employment Department (OED) is the Title 1 provider for Out of School Youth. Oregon VR partners with OED to serve this population.

- (4) State use contracting programs;

**Agency response:**

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 system.

VR's state parent organization, the Oregon Department of Human Services, has established a "buy decision" matrix requiring that state use vendors be evaluated on a priority basis for providing offered services to all state agency programs.

Additionally, the VR program has in place policy and procedure for working with vendors that are part of the State Use Program as well as for evaluating their worksites for potential client placement purposes.

All worksites at employers operating under an "Oregon Forward" contract (the established Oregon State Use program name), will be evaluated on a case-by-case basis to determine the suitability of VR client placement, and assist the vendor if the location is deemed to not meet the criteria for job placement under the guidelines for Community Integrated Employment.

- (5) State agency responsible for administering the State Medicaid plan under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.);

**Agency response:**

In Oregon, the Oregon Health Authority (OHA) is the agency that administers the State Medicaid Program. Through a series of Inter-Governmental Agreements and Memorandums of Understandings the Oregon Department of Human Services is established as the agency that operates the Medicaid programs and waivers. 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.

(6) State agency responsible for providing services for individuals with developmental disabilities;

**Agency response:**

VR and Oregon Department of Developmental Disability Services (ODDS) have focused their work since the 2016 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. VR, ODDS, 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. VR will continue to work with ODDS, ODE, and I/DD service delivery system to increase collaboration to maximize funding, streamline processes, and meet the competitive and integrated employment goals of individuals with intellectual and developmental disabilities.

VR, ODE and ODDS:

- Collaborate on trainings for consistency and quality in curricula used for VR, ODDS and ODE staff throughout Oregon; accomplished through: Agency conferences (VR In-Service, DD Case Management Conference, and ODE Regional Transition Conferences) used mixed groups of staff and cross training techniques to further collaborate training goals. VR, ODDS, and school transition (ODE) staff have co-facilitated trainings on varied topics to ensure staff are consistently co-trained by specialists from the varied areas across Oregon.
- Have ongoing and regularly scheduled Employment First Steering Committee meetings that lead to collaborative actions by VR, ODDS, and ODE.
- Coordinate policy and innovation meetings that are co-led by VR, ODDS, and ODE staff to facilitate these collaborative actions. The three agencies review and discuss all new or newly revised policy to assure alignment across agencies.
- Conduct education and transition meetings to discuss pertinent issues for students who have transition plans.

(7) State agency responsible for providing mental health services;

**Agency response:**

A primary effort of VR and Oregon Health Authority (OHA) Behavioral Health Programs has been in the 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. With the inclusion into Oregon's OARs, evidence-based supported employment services continue to expand across 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.

(8) Other Federal, State, and local agencies and programs outside the workforce development system; and

**Agency response:**

Not applicable.

(9) Other private nonprofit organizations.

**Agency response:**

Not applicable.

**VOCATIONAL REHABILITATION CERTIFICATIONS AND ASSURANCES**

**CERTIFICATIONS**

<b>States must provide written and signed certifications that:</b>	
1.	The designated State agency is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973

<b>States must provide written and signed certifications that:</b>	
	(Rehabilitation Act), as amended by title IV of WIOA, <sup>9</sup> and its State Plan supplement under title VI of the Rehabilitation Act;
2.	In the event the designated State agency is not primarily concerned with vocational and other rehabilitation of individuals with disabilities, the designated State agency must include a designated State unit for the VR program (Section 101(a)(2)(B)(ii) of the Rehabilitation Act). 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 or the designated State unit when the designated State agency has a designated State unit) <sup>10</sup> agrees to operate and is responsible for the administration of the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan <sup>11</sup> , the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations <sup>12</sup> , policies, and procedures established by the Secretary of Education. Funds made available to States under section 111(a) of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;
3.	As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency or the designated State unit when the designated State agency has a designated State unit, agrees to operate and is responsible for the administration of the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan <sup>13</sup> , the Rehabilitation Act, and all applicable regulations <sup>14</sup> , policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;
4.	The designated State unit, or if not applicable, the designated State agency 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, and is responsible for the administration of the VR program in accordance with 34 CFR 361.13(b) and (c);

<sup>9</sup> Public Law 113-128.

<sup>10</sup> All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

<sup>11</sup> 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.

<sup>12</sup> 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 at 34 CFR part 361.

<sup>13</sup> 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.

<sup>14</sup> Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 CFR part 363.

<b>States must provide written and signed certifications that:</b>	
5.	The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.
6.	All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.
7.	The (enter title of State officer below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;
8.	The (enter title of State officer below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;
9.	The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

## **ASSURANCES**

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner, 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:

<b>The State Plan must provide assurances that:</b>	
1.	<b>Public Comment on Policies and Procedures:</b> 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.	<b>Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement:</b> 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

<b>The State Plan must provide assurances that:</b>	
	Act; section 102 of WIOA in the case of the submission of a Unified State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 C.F.R. 76.140.
3.	<p><b>Administration of the VR services portion of the Unified or Combined State Plan:</b></p> <p>The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:</p> <ul style="list-style-type: none"> <li>(a) the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.</li> <li>(b) either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.</li> <li>(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.</li> <li>(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).</li> <li>(e) as applicable, 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.</li> <li>(f) as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.</li> <li>(g) statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.</li> <li>(h) the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.</li> <li>(i) all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.</li> <li>(j) the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.</li> <li>(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.</li> <li>(l) the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A).</li> <li>(m) the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.</li> </ul>

**The State Plan must provide assurances that:**

4.	<p><b>Administration of the Provision of VR Services:</b> The designated State agency, or designated State unit, as appropriate, assures that it will:</p> <ul style="list-style-type: none"><li>(a) comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act.</li><li>(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.</li><li>(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 or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.</li><li>(d) determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.</li><li>(e) comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.</li><li>(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.</li><li>(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.</li><li>(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 sections 101(a)(14) and 511 of the Rehabilitation Act.</li><li>(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.</li><li>(j) with respect to students with disabilities, the State:<ul style="list-style-type: none"><li>(i) has developed and will implement,<ul style="list-style-type: none"><li>(A) strategies to address the needs identified in the assessments; and</li><li>(B) strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and</li></ul></li><li>(ii) has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25), and 113).</li></ul></li></ul>

<b>The State Plan must provide assurances that:</b>	
	(iii) shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
5.	<p><b>Program Administration for the Supported Employment Title VI Supplement to the State plan:</b></p> <p>(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.</p> <p>(b) The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.</p>
6.	<p><b>Financial Administration of the Supported Employment Program (Title VI):</b></p> <p>(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)(H) and (I) of the Rehabilitation Act.</p> <p>(b) The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.</p>
7.	<p><b>Provision of Supported Employment Services:</b></p> <p>(a) The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.</p> <p>(b) The designated State agency assures that 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</p>

**The State Plan must provide assurances that:**

	employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act 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)(7)(C) and (E) of the Rehabilitation Act.

**VOCATIONAL REHABILITATION UNDER TITLE IV  
Oregon Commission for the Blind**

**VOCATIONAL REHABILITATION – Oregon Commission for the Blind**

**Program-Specific Requirements for State Vocational Rehabilitation Services Program**

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

- (a) State Rehabilitation Council.** All VR agencies, except for those that have an independent consumer-controlled commission, must have a State Rehabilitation Council (Council or SRC) that meets the criteria in section 105 of the Rehabilitation Act. The designated State agency or designated State unit, as applicable, has (select A or B):  
 (A) is an independent State commission.  
 (B) has established a State Rehabilitation Council.

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.

In accordance with Assurance 3(b), please provide information on the current composition of the Council by representative type, including the term number of the representative, as applicable, and any vacancies, as well as the beginning dates of each representative’s term.

<b>Council Representative</b>	<b>Current Term Number/ Vacant</b>	<b>Beginning Date of Term Mo./Yr.</b>
Statewide Independent Living Council (SILC)		
Parent Training and Information Center		
Client Assistance Program		
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)		
Community Rehabilitation Program Service Provider		
Business, Industry, and Labor		
Disability Advocacy Groups		
Current or Former Applicants for, or Recipients of, VR services		
Section 121 Project Directors in the State (as applicable)		

State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)		
State Workforce Development Board		
VR Agency Director (Ex Officio)		

Not applicable. OCB is an independent consumer controlled commission, and not subject to this section.

If the SRC is not meeting the composition requirements in section 105(b) of the Rehabilitation Act and/or is not meeting quarterly as required in section 105(f) of the Rehabilitation Act, provide the steps that the VR agency is taking to ensure it meets those requirements.

[text box]

Not applicable. OCB is an independent consumer controlled commission, and not subject to this section.

In accordance with the requirements in section 101(a)(21)(A)(ii)(III) of the Rehabilitation Act, include a summary of the Council's input (including how it was obtained) into the State Plan and any State Plan revisions, including recommendations from the Council's annual reports, the review and analysis of consumer satisfaction and other Council reports.

[text box]

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 2020 Comprehensive State Wide Needs Assessment (CSNA), and detailed preliminary feedback from the 2023 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.

Provide the VR agency's response to the Council's input and recommendations, including an explanation for the rejection of any input and recommendations.

[text box: List each recommendation/input followed by the VR agency response]

Not Applicable. The Oregon Commission for the Blind procured, participated in, and oversaw the development of the 2020 CSNA, the initiation of the 2023 CSNA, and the development of OCB's portion of Oregon's WIOA PY 2022-2023 Combined State Plan. OCB's Board of Commissioners provided feedback on the development of agency goals and strategic priorities

**(b) Comprehensive Statewide Needs Assessment (CSNA).** Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

(1) The VR services needs of individuals with disabilities residing within the State, including:

(A) Individuals with the most significant disabilities and their need for Supported Employment;  
[text box]

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 and those who are projected to become legally blind within two years of eligibility determination). All Oregonians who are legally blind are considered to have the most significant disabilities.

Estimating the number of Oregonians with legal blindness is not easy or straight forward. 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 7.8%, which represents an estimated 99,996 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 0.7% which impacts 6,228 young adults (under 18 years old).
- Working age adults (18 to 64) experience vision loss with a prevalence of 2.2%, totaling 55,258 individuals
- Older adults (65- 74) vision loss prevalence is 5.6% which consists of 44,738 adults

#### Vision Loss and Work:

Americans between 18 and 64 who report a visual difficulty which breaks down to 50% employed, about 5% unemployed (but in the labor force), while 45% are not in the labor force at all. Compared to 2022, about 30% of Oregonians with vision loss were employed. For reference, the employment rate among sighted Oregonians is 88%, or about 1.78 million working adults while for Oregonians with a disability this rate is 50% (MOE +/- 2.1). The employment rate for Oregonians with vision difficulty is comparable to 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 (based on 2023 ACS estimates of Oregonians with vision difficulty and 10% of Americans reporting vision difficulty and meeting unemployed definition):

Adults: 21 to 64 and Vision Difficulty: 55,258 Oregonians \* 10% = 5,258

65 and over: 44,738 Oregonians \* 10% = 4,738

Total = 9,996

For reference, the Oregon Commission for the Blind has provided services for 613 unduplicated individuals in PY20, 649 individuals in PY21, and 681 in PY22 through OCB's VR Program.

From the 2023 CSNA section on Supported Employment:

Unfortunately, there is little research focused on individuals with vision loss who qualify as supported employment. The American Community Survey collects data on those that may qualify as supported employment by asking respondents to answer the question, "Because of a physical, mental, or emotional condition, do you have serious difficulty concentrating, remembering, or making decisions?" As with the question determining rates of visual impairment (Are you blind or do you have serious difficulty seeing, even when wearing glasses?), there is a chance for error as the survey does not measure severity of the condition, but it is the most reliable data currently available. Of those who answered affirmatively to the question above, 33.4% of Oregonians reported being employed in 2022. Oregon ranks 20th nationally in the employment rate of individuals with a cognitive disability (Disability Statistics 2022). The Case for Inclusion, a leading source for data and policy recommendations regarding the effectiveness of state Medicaid programs in serving people with intellectual and developmental disabilities (IDD), ranked Oregon 2nd in the country for its efforts to serve individuals with intellectual and developmental disabilities (American Network of Community Options and Resource 2019). In 2019, Oregon was one of 13 states to have no individuals with intellectual and developmental disabilities living in institutionalized setting (American Network of Community Options and Resource 2019). In 2023, 57% of Oregonians with I/DD were working in integrated employment compared to just 20% nationally (American Network of Community Options and Resource 2023).

The Agency served 69 supported employment participants between 7/1/2020 and 6/30/2023. Of these, 32 (46%) exited services in that time period. Of those 32, 9 (28%) exited successfully.

Although national statistics are difficult to find, there is discussion of the disproportionate impact on supported employment individuals. Individuals with the most significant disabilities may have hybrid or remote work but it is believed to be rarer. Supported employment vocational rehabilitation participants often require an extensive team of in-person support from personal support workers and job coaches to succeed in employment. In addition to the tendency for

supported employment individuals to work in-person, they then faced additional barriers as COVID had significant impacts on in-person support for these individuals. The contracted employment support vendors used by the Agency experienced great upheaval during COVID with trying to move as many tasks as possible to virtual and a higher rate of staff turnover. The rate of successful placements for the Agency's supported employment participants reflects the difficulty establishing stable employment.

Overall OCB client feedback on VR services from the completed 2023 CSNA suggests there are several service areas which clients believe helped them find a job:

- Assistive Technology Skills Training
- Orientation and Mobility Training
- Vocational Counseling
- Working with a job developer
- Confidence building

Recommendations from the 2023 CSNA:

### **1. Providing Individualized Services**

Participant respondents and vocational rehabilitation counselors indicated the importance of continued individualized services and recommended future considerations for further emphasis on tailored services. Participants spoke of instructors creating an "okay to fail" and self-paced approach to services. Most indicated already receiving this type of individualized service delivery and the Agency will continue to support this approach. Staff aspects of training center service delivery to better meet individual needs and circumstances of participants. These include alternative strategies to promote training attendance than what is currently in place. They also highlighted an interest in seeing disability and cultural needs being assessed to determine level of need and using this information to inform service delivery. Counselors would also like to revisit what is considered in determining a participant is ready to engage in training center instruction.

### **2. Awareness of Services**

A general theme among participant respondents was awareness of services. The participant focus groups especially explored the challenges provided by a perceived lack of awareness. Generally, they would like better communication and more avenues through which to learn about services. Specific recommendations included a manual, a more informative website, and newsletters highlighting available services. The Agency has published materials available describing services, however it is noted that these materials need to be more widely and frequently circulated to participants.

### **3. Services to Potentially Unserved or Underserved Populations**

#### **3a. Ethnic and Racial Minorities**

A theme throughout participant respondents was the importance of diversity, equity, and inclusion (DEI) training for Agency staff and vendors. Vocational rehabilitation counselors also expressed a desire for continued training in this area. The Agency has provided multiple mandatory DEI trainings over the years and will continue to make this training a priority. Staff would also like to make partnering with organizations serving these populations a priority yet acknowledge limitations of time to establish these relationships and a lack of awareness of the existence of such organizations. The Agency may consider making this a priority through the help of vocational rehabilitation counselor interns or help of other staff with the bandwidth to do this outreach. The Agency will also be investing more in understanding the experience of immigrants in receiving vocational rehabilitation services. Staff also underscored the importance of recruiting staff that better represent the diversity of participants, which is a high priority for the agency as well.

### 3b. Rural Participants

A theme amongst participant respondents and staff was the importance of greater vendor choice and vendors with adequate availability to serve rural areas. This continues to be a barrier to employment. The Agency has invested resources in seeking vendors serving rural areas and will continue to do so. Transportation also continues to be an issue for rural participants and the Agency continues to assist participants in addressing these barriers as resources allow.

### 3c. Supported Employment

Two main themes presented themselves in the results of surveys and interviews. These are tailoring services to meet the needs of supported employment participants and developing relationships with other individuals and entities providing additional support. Specific recommendations from staff include adapting training curriculum that considers the specific needs of supported employment participants including those with behavioral challenges, intellectual and developmental disabilities, and severe and persistent mental illness. A vocational rehabilitation counselor also suggested the Agency designate a specific counselor to be a supported employment specialist. Developing relationships with other Agencies, vendors, and employers was also identified as needs of supported employment participants.

### 3d. Students under 24

Themes across responses from participants and vocational rehabilitation counselors included the need to identify strategies to engage students and youth more. An identified strategy for doing so include increasing participation in the Agency's Summer Work Experience Program (SWEP), a several week work program in which youth participate in summer work experience for a variety of employers and engage in enrichment activities. Business relations coordinators suggested students need more robust career exploration services as they identify their vocational goal.

## **4. Connecting Participants with other Social Service Support**

Both participants and vocational rehabilitation counselors identified barriers to employment other than those related to vision loss. These were financial including housing and other unmet basic needs. Vocational rehabilitation counselors expressed a desire for more training on

available public support and navigating those processes. They would also like to have an Agency staff member specializing in this support.

### **5. Staff Training and Collaboration**

The need for additional and ongoing training for staff was mentioned often in interviews with staff. Two themes presented by staff include training on supporting potentially underserved or unserved groups. Diversity, equity, and inclusion and providing services to participants with multiple disabilities including mental health challenges were discussed in multiple interviews. Staff also expressed a need for training on innovations and trends in the labor market including technological advancements and emerging industries like careers in social media. Approximately 15% of participant respondents indicated staff training as a way to improve services overall.

### **6. Considering Labor Market Trends and Employer Needs**

Over half of participant respondents indicated an employer's willingness to hire individuals with vision loss as a barrier to employment. Strategies for developing relationships with employers to increase successful participant employment outcomes included a focus on services provided to employers by the Agency. Employers were asked to identify services that are or would be helpful from a list of services offered by the Agency. Frequently chosen included help identifying accommodations, assistance analyzing position descriptions for accessibility, and worksite accessibility consultations.

### **7. Training and Recruiting Vendors**

Major needs identified by participant respondents and staff regarding vendors providing vocational services are recruitment and vendor training. A lack of vendors providing services is a commonly known statewide problem. This is especially prevalent in rural areas. In addition to availability, the high turnover in service providers creates a strain on the Agency as they are constantly orienting and training new vendor staff. Similar training as identified as important for staff was also identified as important for vendors. This includes DEI training and working with participants with multiple disabilities.

### **8. Conducting Outreach to Various Audiences**

Outreach to all groups was deemed a need. This includes existing and potential participants, vendors, and employers. Specific groups including racial and ethnic minorities and those with mental health challenges were identified. The Agency continues to find ways to innovate in outreach strategies.

(B) Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program; [text box]

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 2022 and PY 2023 to the 2023 U.S. Census Estimates of Oregon demographics:

*Native American: Commission served 4%, Oregon population 1.9%*

*Asian: Commission served 6%, Oregon population 5.1%*

*Black or African American: Commission served 8%, Oregon population 2.3%*

*Pacific Islander: Commission served 2%, Oregon population 0.5%*

*White: Commission served 84%, Oregon population 85.9%*

*Hispanic: Commission served 13%, Oregon population 14.4%*

Because clients can select more than one race, the OCB percentages do not add up to 100%.

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. OCB continues to promote and find partnerships with agencies that may connect with clients based on their intersecting identities.

This analysis is quantitative and does not address disparities in cultural competency, service quality, or 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.

(C) Individuals with disabilities served through other components of the workforce development system; and [text box]

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 recorded 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. Vocational Rehabilitation Counselors (VRCs) are co-located in WSO centers and staff regularly attend WSO meetings in order to facilitate information sharing.

Survey responses from the completed 2017 CSNA indicated accessibility to WSO systems as a significant barrier to uptake of services and resources. The 2023 CSNA suggested that only 10% of clients had been connected to a WSO office so there is more work to be done in this area.

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.

It remains uncommon that legally blind Oregonians are served through other components of the statewide workforce development system before receiving services from OCB.

WSO Centers were largely closed during PY 20-21 for anything other than services by appointment or delivered virtually. OCB continues to leverage relationships with Oregon's general Vocational Rehabilitation agency, as well as WSO core partners, for appropriate referral and access to resources and services. OCB clients and staff awareness of WorkSource Oregon services and resources has increased since the prior submission through direct engagement and partnering.

(D) Youth with disabilities, including students with disabilities and their need for pre-employment transition services. 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 IDEA.

[text box]

The third major program that supports the mission of OCB is “Supporting in-school youth who are blind as they transition from high school to further education, training and employment through the provision of pre-employment transition services.” Individuals with disabilities might already have complicated medical needs making COVID an even more stressful experience. The already common experience of isolation was exaggerated ten-fold and counselors report observing the impact of that isolation. This is especially prevalent among youth who, as a population, are in a critical developmental period. Counselors observed a regression in social and academic skills that is now impacting their ability to participate in vocational services and succeed in their academic endeavors.

The Transition and Employment First Officer is a position in the Agency that specializes in youth and supported employment services. Through various feedback mechanisms, this position was able to provide insights into what is working for this population. Youth receiving services provided by OCB indicated community created by the Agency – shared classes, casual interactions, and attending the Living with Blindness course – are important to their success of supported employment participants. In addition, providing services through Agency staff facilitates better service delivery as the Agency’s staff have a more thorough understanding of the individual. The work the business relations staff are doing to collaborate with employers to find opportunities for supported employment clients is essential. The Agency also participates in forums designed to better support these participants including the employment first policy and innovation training and technical assistance group. Counselors are encouraged to attend regional employment first meetings. The Agency has also received regular training from the regional employment specialists from the State of Oregon’s Office of Developmental Disability Services.

Youth and students’ survey responses indicate the highest priority needs are 1) basic employment needs around mobility, technology, and training; 2) learning to be your own advocate to get services you need; and 3) need additional time to adapt to new job workload.

In the 2023 CSNA, participants were asked the question, “How can OCB better meet the needs of students and youth?” As a follow up to the question asking respondents to identify needs of students and youth, they were asked to identify strategies for improving services for this population. Most of the responses included ways to increase outreach, education, and training. One respondent suggested presenting on visual impairment in schools as students will be potential future employers of individuals with vision loss. One respondent wrote, “OCB Could be more involved with what students do. Having OCB visit schools to do assemblies on blindness could help teach the next generation who will be hiring the skills they need to interact

with the blind in future. This could help eliminate feelings that a blind person can't do a job with demonstrations.”

Summer Work Experience Program (SWEP) cornerstone of services for students and youth: The Commission’s Summer Work Experience Program (SWEP) is a meaningful experience and a gateway for many youth to services from the Commission. Again referencing question 8 (How can OCB better meet the needs of students and youth?) on the CSNA one respondent wrote, “I think the agency is doing good in this area. The SWEP program is the best program we have for our students. I would like to see this grow larger in the future with more outreach.”

In response to this question However, one comment suggested that the agency could place a greater focus on staff training for those with direct client contact. The respondent asked for more blindness etiquette to help the students feel more at ease. The agency’s leadership team and commission recognize the importance of employing competent staff and are working with regional programs throughout the state to recruit Teachers of the Visually Impaired (TVIS) and other skilled staff for summer-based programming such as SWEP. The agency acknowledges that long time staff have retired and that some institutional knowledge has been lost. They are reevaluating how to best recruit, train, and support staff in SWEP direct service roles.

According to research on the characteristics of a “model program” for youth summer work experiences, successful programs are associated with more job-related services and fewer assessment and diagnostic services. Youth cost less to serve, and youth achieved significantly higher employment rates at case closure, although worked slightly fewer hours and earned less per week at closure.

These results signify implications for vocational rehabilitation practice with students and youth with disabilities, especially in the context of transition service requirements of the Workforce Innovation and Opportunity Act. Further, early work experiences for youth with visual impairment and enrolled in special education was associated with better employment outcomes later. However, the type of experiences matter a lot, for example, varied experiences and longer-term experiences are associated with better employment outcomes later. This should especially be emphasized for youth with SSI, in addition to educating youth and their families about opportunities to retain benefits while working.

Recommendations: Continue efforts in line with WIOA goal to engage students earlier. Ensure sustainability of SWEP and refocus energy on building a strong program. Training for other staff on learning needs of students. The role of mentorship and positive role models cannot be underestimated. To summarize the most important themes from this section, the top strategic priority is to increase collaboration with schools/regional programs throughout Oregon and build on momentum of the agency’s ongoing work.

OCB participates in the Transition Technical Assistance Network, which is a collaboration between OCB, the general VR agency, and Department of Education to provide a variety of Pre-ETS activities to students across Oregon. These include regional student summits, virtual

statewide job clubs, person-centered planning, and engagement directly in schools. OCB also works with the TTAN to organize and put on the annual Oregon Statewide Transition Conference, which provides training and networking opportunities for educators and rehabilitation professionals serving students with disabilities. OCB regularly presents at this conference as well and recently hosted a networking/information session to increase awareness of the breadth of OCB's Pre-ETS and transition services.

OCB hosts a quarterly College Collaborative, whose goal is to provide increased collaboration and communication between OCB counselors and instructors, postsecondary disability services professionals, and ESD/Regional Program instructors. These meetings in part address perceived service gaps, developments in access technology, and organizational updates relevant to student educational and vocational outcomes. Providing these meetings virtually has increased attendance and allows for participation by individuals working with students in more rural areas to address the specific needs of those demographics.

OCB attends a variety of stakeholder meetings statewide, including county Employment First meetings that address the needs of students receiving long-term supports and ESD/Regional Program staff meetings to increase our level of collaboration with those professionals.

OCB works with employers and educational partners to learn about existing internship and training opportunities so counselors, clients, and families can share and encourage participation of these opportunities. OCB also works with those partners to forecast potential accessibility barriers and to leverage OCB resources and expertise to address issues as appropriate.

(2) Identify the need to establish, develop, or improve community rehabilitation programs within the State.

[text box]

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 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 the participant 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 contracts with 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, 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 began to develop and deliver blindness and agency specific onboarding and training activities to all of OCB's contracted CRPs. This onboarding covers OCB resources, processes, policies and service delivery and has continued through PY23 and present. 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.

Many CRPs left the field during PY 2020 due to COVID limitations and impediments, and many more - especially those in rural areas, were increasingly likely to leave. OCB has maintained facilitating weekly Jobsville meetings with regional and statewide CRPs to stay connected and to continue to support CRPs through Covid and into the present. CRP Training topics and activities included: Career Pathways, client and business partner staffing, WorkSource Oregon, Assistive Technology demonstrations, Progressive Employment, Business Profiles, and others. OCB Business Relations Coordinators consistently communicate with CRPs and potential CRPs around the state, educating them about OCB, Assistive Technology and adaptive techniques for independent living and employment skills. We also provide consultation and training around the importance of collaborating with our workforce partners whenever possible. OCB has continued all of these efforts through PY23. In PY 2023, OCB Business Relations Coordinators (BRCs) engaged in over 83 CRP training and support activities, throughout the state, with a strong focus on rural Oregon service providers.

**(c) Goals, Priorities, and Strategies.** Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the

VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State's performance under the performance accountability measures of section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under section 107 of the Rehabilitation Act. VR agencies must—

(1) Describe how the SRC and the VR agency jointly developed and agreed to the goals and priorities and any revisions; and  
[text box]

1. The Oregon Commission for the Blind does not operate under the direction of the State Rehabilitation Counsel, but rather operates as a board-driven agency/commission. OCB's previously identified goals and strategies from the prior submission remain relevant for PYs 24 -27.
2. OCB will track specific service elements to identify leading and lagging indicators (and/or additional strategies) to gauge progress towards State Plan goals and strategies, and to directly connect interventions and activities with targeted outcomes. OCB will seek Technical Assistance as needed for implementation.

(2) Identify measurable goals and priorities in carrying out the VR and Supported Employment programs and the basis for selecting the goals and priorities (e.g., CSNA, performance accountability measures, SRC recommendations, monitoring, other information). As required in section 101(a)(15)(D), (18), and (23), describe under each goal or priority, the strategies or methods used to achieve the goal or priority, including as applicable, description of strategies or methods that—

(A) Support innovation and expansion activities;

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 2020 Oregon Unified State Plan submission. It remains relevant as an agency priority for continued work in the 2024-2027 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 also aligns with OCB's strategic goals and priorities.

(B) Overcome barriers to accessing VR and supported employment services;

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 findings from the 2020 CSNA. Based on the 2023 CSNA, stakeholders have asked for targeted outreach to underrepresented groups. The Agency may consider making this a priority through the help of vocational rehabilitation counselor interns or help of other staff with the bandwidth to do this outreach. Outreach to all groups was deemed a need. This includes existing and potential participants, vendors, and employers. Specific groups including racial and ethnic minorities and those with mental health challenges were identified. The Agency continues to find ways to innovate in outreach strategies.

Within the past year, staff 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 who are potentially eligible. Vocational Rehabilitation Counselors who serve youth develop relationships with appropriate staff at the regional level and work jointly on students' Individualized Education Plans (IEP) and Individual Plans for Employment (IPE) with students as young as 14 years old.

Goal 2: Increase Agency outreach and effectiveness of services to individuals and communities that would benefit from vocational rehabilitation services.

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.

(C) 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, post secondary education, employment, and pre-employment transition services); and

Goal 2. 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 goal of Exemplary Service.

- (D) Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes. [text box: List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority]

Goal 4: Increase the capacity of Oregon's businesses to hire and retain Oregonians experiencing vision loss.

This goal aligns with the State of Oregon's Workforce Talent Development Board's 2020 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 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.

**(d) Evaluation and Reports of Progress: VR and Supported Employment Goals.** For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—

- (1) Progress in achieving the goals and priorities identified for the VR and Supported Employment Programs; [text box: List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies]

The goals outlined in the approved VR portion of the prior State Plan for the most recently completed program year, PY 23-23, were as follows:

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.

**Progress:** Goal 1 is a continuation goal from OCB's 2020 State Plan submission, is unchanged, and will remain a priority goal for OCB to work toward moving forward in the 24-27 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 (CRPs) 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.

OCB provided disability awareness and assistive technology demonstration training to the state workforce system's career coaches and ICAP staff. 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.

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 (AT) Specialists and two statewide Business Relations Coordinators (BRCs).

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 state-wide. 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 uses software (Aware) to track business engagement. This business module within Aware 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. The agency has a target number of outreaches per quarter with a target percentage of outreaches focuses on rural counties.

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. For each PY 22 and 23, more than 200 out reach and educational activities occurred which included urban and rural stakeholders.

OCB provided training to all agency staff in PY 22 on the ABCs of Cultural Competence. 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. The agency completes a DEI plan annually (alongside all other Oregon state agencies) which includes planning for cultural competency training for staff. OCB staff are also encouraged to seek out opportunities to increase their cultural effectiveness and literacy (via on-line and in-person conferences/training).

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 monthly counselor professional development.

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.

OCB has a robust 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.

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: Increase the capacity of Oregon's businesses to hire and retain Oregonians experiencing vision loss.

**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.

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 in order to embed OCB approach to career development and employment.

New CRPs and job developers meet with the business relations team to learn about how OCB serves both clients and businesses. They are introduced to blindness etiquette, assistive technology, and the agency's values. In addition to one on one onboarding, OCB has conducted several large group CRP trainings where the same topics are covered. These large group sessions consist of approximately 25 CRPs and allow for discussion and greater use of on the spot problem solving as examples of how CRPs can be most effective.

Through regular outreach and education, OCB Business Relations Coordinators (BRCs) effectively connect with businesses. Topics included in the outreach conversations include PE options such as work experiences, internships, job coaches, and OJT. BRCs share creative ideas such as job modifications that can help employers retain employees who are blind.

- (2) Performance on the performance accountability indicators under section 116 of WIOA for the most recently completed program year, reflecting actual and negotiated levels of performance. Explain any discrepancies in the actual and negotiated levels; and  
[text box]

The following is a representation of The Oregon Commission for the Blind's performance in the WIOA Performance Indicator areas by PY:

- 2nd Quarter Employed PY21: 42%, PY22: 42%
- 4th Quarter Employed PY21: 38%, PY22: 46%
- Credential Attainment: PY21: 30%, PY22: 22%
- Measurable Skills Gain PY21: 29%, PY22: 60%
- Median Earnings 2nd QTR after Exit PY21: \$15,360, PY22: \$ 13,950

OCB will continue to use the following performance accountability indicators as articulated under section 116 of WIOA as appropriate: The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program; The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program; The median earnings of program participants who are in unsubsidized employment during the second quarter after exit; Credential attainment rate; Measurable skill gain; Effectiveness in serving employers (currently not applicable).

- (3) The use of funds reserved for innovation and expansion activities (sections 101(a)(18) and 101(a)(23) of the Rehabilitation Act) (e.g., SRC, SILC).  
[text box]

OCB did not receive or spend funds specifically designated as reserved for innovation and expansion (I&E).

OCB has partnered with Oregon's general VR agency on a DIF project awarded in PY 2021 and will continue to do so.

OCB did not fund any portion of SILC activities using I&E funds in PY 2018-2023.

**(e) Supported Employment Services, Distribution of Title VI Funds, and Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.**

- (1) Acceptance of title VI funds:  
(A) [check box] VR agency requests to receive title VI funds.  
(B) [check box] VR agency does NOT elect to receive title VI funds and understands that supported employment services must still be provided under title I.
- (2) If the VR agency has elected to receive title VI funds, Section 606(b)(3) of the Rehabilitation Act requires VR agencies to include specific goals and priorities

with respect to the distribution of title VI funds received under section 603 of the Rehabilitation Act for the provision of supported employment services. Describe the use of title VI funds and how they will be used in meeting the goals and priorities of the Supported Employment program.

[text box]

All OCB Vocational Rehabilitation staff are educated in the provision of supported employment services and understand the matters 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 (such as job coaching, worksite assistive technology support and other retention services) that begin after client employment. 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 also 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, including youth 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 often required in order for clients to be successful.

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, including youth with the most significant disabilities, who require additional supports and long term support planning by a comprehensive rehabilitation team.

The target population is divided into three segments: 1. Individuals who are deaf- blind 2. Individuals with developmental disabilities in addition to blindness 3. 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, 24 months:

1. Intensive on the job skills training and other training to achieve and maintain job stability
2. Follow up services to reinforce and stabilize the job placement
3. Discrete post-employment services following transition that are unavailable from an extended services provider and that are necessary to maintain the job placement
4. Specialized technology devices and training
5. Follow up services such as regular contact with the employer, the individual, etc., to reinforce and stabilize the job placement
6. Facilitation of natural supports at the work site.

Necessary extended support is funded by the agency, but provided by other agencies to youth with most significant disabilities for a period of at least 4 years or until the individual turns 25 and no longer meets the definition of a "youth with a disability".

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 24 months). These are services that are needed to support and maintain the individuals with the most significant disabilities in supported employment.

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.

- (3) Supported employment services may be provided with title 1 or title VI funds following placement of individuals with the most significant disabilities in employment. In accordance with section 101(a)(22) and section 606(b)(3) of the Rehabilitation Act, describe 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; and the timing of transition to extended services.

[text box]

OCB is committed to providing Supported Employment services to individuals with the most significant disabilities, including youth with the most significant disabilities. The scope of these services include but are not limited to: the provision of skilled job coaches who accompany the worker for intensive on the job training, systematic skill 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 retention.

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. 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-profit, 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. OCB can fund extended services for youth with the most significant disabilities for a period of up to 24 months, or until the individual turns 25 and

no longer meets the definition of a "youth with a disability", whichever comes first. OCB engages in training CRPs on topics such as the context, issues and skills associated with vision loss.

- (4) Sections 101(a)(22) and 606(b)(4) of the Rehabilitation Act require the VR agency to describe efforts to identify and arrange, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services. The description must include extended services, as applicable, to individuals with the most significant disabilities, including the provision of extended services to youth with the most significant disabilities in accordance with 34 CFR 363.4(a) and 34 CFR 361.5(c)(19)(v).  
[text box]

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, trauma or 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 eligible or potentially eligible students with disabilities before certification for sub-minimum wage work has had no 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. Extended services for youth with most significant disabilities may also be funded through vocational rehabilitation resources, for up to four years, or until the individual turns 25 and no longer meets the definition of a "youth with a disability", whichever comes first.

Training and post-employment services that will lead to supported employment are provided by OCB. Supported Employment begins after job placement, any services provided prior to

placement are VR services, not supported employment services. 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. Vocational evaluation and trial work experience are VR services. On-going supports and job retention are part of supported employment activities. Any services provided prior to employment are VR services, after job placement, Supported Employment services are provided as needed.

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.

**(f) Annual Estimates.** Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 CFR § 361.29(b), annual estimates must include the following projections:

(1) Estimates for next Federal fiscal year—

(A) VR Program; and

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
N/A	577 in PY 2022	580	2049660.86	46

In 2022, the American Community Survey indicated 8.5% (n=106,224) 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 and FFY21 service projections of the potentially eligible pool of clients.

The State Oregon Office of Economic Analysis predicts a 0.67% increase over the next two years. Assuming the percentage of individuals experiencing vision loss remains constant, the number of Oregonians who experience vision loss may be 106,935.

The American Community Survey (ACS) is used by the Centers for Disease Control (CDC) as a tool for CDC vision based initiatives.

(B) Supported Employment Program.

Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
N/A	49	50	183,057.78	7

**(g) Order of Selection.**

The VR agency is **not** implementing an order of selection and all eligible individuals will be served.

Based on population growth OCB asserts that the agency will be able to meet demand for services in PY 24-27.

[check box] The VR agency is implementing an order of selection with one or more categories closed.

\* VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

Pursuant to section 101(a)(5) of the Rehabilitation Act, this description must be amended when the VR agency determines, based on the annual estimates described in description (f), that VR services cannot be provided to all eligible individuals with disabilities in the State who apply for and are determined eligible for services.

(1) For VR agencies that have defined priority categories describe—

(A) The justification for the order;  
[text box]

The Oregon Commission for the Blind is not currently in an Order of Selection.

(B)The order (priority categories) to be followed in selecting eligible individuals to be provided VR services ensuring that individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and  
[text box]

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, through 23 and does not expect to be in an Order of Selection for PYs 24-27.

(C)The VR agency's goals for serving individuals in each priority category, including how the agency will assist eligible individuals assigned to closed priority categories with information and referral, the method in which the VR

agency will manage waiting lists, and the projected timelines for opening priority categories. NOTE: Priority categories are considered open when all individuals in the priority category may be served.

[text box]

OCB is not currently implementing an Order of Selection.

When the order of selection for services is in effect, eligible individuals will be assigned to one of three priority categories: 1. Individuals with most significant disabilities; 2. Second priority: Individuals with significant disabilities; 3. Third priority: all other individuals with disabilities. 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.

(3) Has the VR agency elected to serve eligible individuals outside of the order of selection who require specific services or equipment to maintain employment?

[check box] Yes

[check box] No

OCB prioritizes individuals who require specific services or equipment in order to maintain employment. OCB has elected to serve eligible individuals, regardless of any established Order of Selection, who require specific services or equipment to maintain employment.

**(h) Waiver of Statewideness.** The State plan shall be in effect in all political subdivisions of the State, however, the Commissioner of the Rehabilitation Services Administration (Commissioner) may waive compliance with this requirement in accordance with section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 CFR 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 CFR 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate “not applicable.”

[text box]

OCB does not have a waiver of Statewideness in place, and does not request one.

**(i) Comprehensive System of Personnel Development.** In accordance with the requirements in section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

- (1) Analysis of current personnel and projected personnel needs including—
- (A) The number and type of personnel that are employed by the VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to clients;
  - (B) The number of personnel currently needed by the VR agency to provide VR services, broken down by personnel category; and
  - (C) Projections of the number of personnel, broken down by personnel category, who will be needed by the VR 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.

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Vocational Rehabilitation Counselor	14	14	16
Rehabilitation Instructors	24 (15 VR, 9 Independent Living for Older Blind)	24	26
Rehabilitation Assistants	9	9	11
Administrative Unit	9 (5 VR, 4 Business Enterprise)	9	10
Executive Management/Management	7 (1 Executive Director, 1 CFO, 1 VR Director, 1 WIOA Manager, 1 Training Center Director, 1 Office Manager, 1 Business Enterprise)	7	8

	Director, 1 Independent Living for Older Blind Director)		
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(D) Ratio of qualified VR counselors to clients: [text box]

The agency has a total of 14 Vocational Rehabilitation counselor positions. a) 12 are caseload-carrying positions b) 1 is a career exploration counselor with a small caseload c) 2 are counselors who specialize in working with employers to enhance employment outcomes. The three year average for PYs 20, 22, and 22 ratio of clients served to VRC (full caseload carrying) FTE was 62:1 (including potentially eligible/Pre-ETS clients). OCB reviews and analyzes qualified personnel needs on an ongoing basis to ensure quality service provision.

(E) Projected number of individuals to be served in 5 years: [text box]

The State Oregon Office of Economic Analysis provides a short and long term population forecast for the state. The office forecasts a population of 4,468,800 in 2029. In 2022, the ACS indicated 4.3% of Oregonians reported vision loss which would suggest that 192,158 might be eligible for services at any given point in five years. At this point, the forecast is more of an art than a science. There is no way to know the number of legally blind individuals out of how many Oregonians experience any form of vision loss. For context, the agency three year average of individuals served is 665 unique cases which equates to approximately 0.07% of the population that experiences any form of vision loss. In five years the agency may serve slightly over 700 participants in the VR program (excluding IL and OB programs).

The economic forecast can be found at

<https://www.oregon.gov/das/oea/pages/forecastdemographic.aspx>

(2) Data and information on personnel preparation and development, recruitment and retention, and staff development, including the following:

(A) A list of the institutions of higher education in the State that are preparing VR professionals, by type of program; the number of students enrolled at each of those institutions, broken down by type of program; and 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.

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
Western Oregon State University (WOU)	MS, Rehabilitation Counseling	39	12
Portland State University	MS, Clinical Mental Health Counseling and Clinical Rehabilitation Counseling	37	10

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 and hold Council for Accreditation of Counseling and Related Educational Programs (CACREP) accredited graduate programs in Rehabilitation Counseling.

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. All students are served through the main PSU campus in downtown Portland, with courses scheduled in the evenings, making it possible for working individuals to have access to attaining a Clinical Rehabilitation Counseling degree.

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.

Oregon has no other Institutions of Higher Education preparing VR professionals.

Regional Institutions of Higher Education not in Oregon:

- Western Washington University (WWU), located in Everett, Washington, offers a hybrid on-campus/online two-year Master of Arts in Rehabilitation Counseling.
- Idaho State University (ISU) was granted RSA funding and opened a 2-year program of study leading to a Master of Counseling in Clinical Rehabilitation Counseling program in both Pocatello and Meridian, Idaho which began in August 2020.

(B) The VR agency's plan for recruitment, preparation and retention of qualified personnel, which addresses the current and projected needs for qualified personnel; and the coordination and facilitation of efforts

between the VR agency 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.

[text box]

OCB works closely with the graduate education programs at WOU, PSU, and elsewhere to increase the recruitment of qualified applicants in the field. OCB connects with faculty and leadership in these graduate programs, and works to provide practicum and internship sites for students in these programs. In 2018-2019 OCB hosted two graduate interns and since then increased to three graduate interns each year to date. The agency consistently engages with WOU and PSU to solicit additional students moving forward. OCB works intentionally to identify potential new hires from minority backgrounds and those with disabilities, and utilizes the state's human resources recruiting resources to improve its recruitment messaging to communities of color and to people with disabilities seeking employment with the state of Oregon. OCB reaches out to professional organizations such as AER and others to solicit potential candidates for opportunities at OCB. OCB leads the state of Oregon as the agency with the highest percentage of people with disabilities on staff.

(C) Description of staff development policies, procedures, and activities that ensure all personnel employed by the VR agency receive appropriate and adequate training and continuing education for professionals and paraprofessionals:

- i. 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
- ii. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to VR agency professionals and paraprofessionals and for providing training regarding the amendments to the Rehabilitation Act made by the Workforce Innovation and Opportunity Act.

[text box]

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. Two OCB staff are fluent in ASL and one is Spanish speaking. 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. The agency regularly sends instructors to conferences and remote trainings.

In 2022 the agency implemented quarterly check ins for staff. These one on one sessions are documented in the HRIS and generally follow the same template: review of prior quarter goals, setting goals for the next quarter, general feedback, and other timely topics. The agency has a maintains a 100% completion rate of quarterly check ins.

In October 2022, the agency hosted an all-staff training week based out of the agency headquarters. The training lasted all week and covered role-specific topics. All staff members participated in CliftonStrengths, de-escalation techniques, adjustment to blindness, and general VR field updates. Instructors participated in sessions around andragogy, cortical visual impairment, and technology related to teaching. Counselors participated in sessions related to benefit planning, eye reports, and self-employment. OCB intends on hosting a similar training late 2024 and fully supports the professional development of its staff.

Further, in calendar years 2022 and 2023 OCB hosted several vendors who specialize in technology. The agency also sent four instructors to the CSUN technology conference and has committed funds to continue this practice.

OCB conducts a minimum of monthly training for counselors. These sessions provide training to staff on a variety of topics and subject areas, including: assessment, assistive technology, vocational counseling, job placement measurable skill gains, data accuracy/validation (to name a few).

Throughout the year all OCB staff are encouraged to engage in career/professional development activities, which are tracked internally as part of OCB's performance management system. Examples of stand alone training activities throughout the year include topics such as: Career Pathways, Business Engagement, Ethics, motivational interviewing, and more. Staff engage in professional development activities regardless of their team designation or role.

(3) Description of VR agency policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that VR agency 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

- (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.  
[text box]

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.

OCB is well connected to the Oregon Employment Department via several venues. The Workforce Talent and Development Board (WTDB) convenes industry and education leaders several times per year to make sure Oregonians have equitable access to advancement opportunities. OCB is represented by OVRS and sends representation to participate as audience members and bring back information to the staff. Furthermore, OCB has a representative on the Employment Department's Workforce Modernization project. In this workgroup, OCB is able to advocate for accessibility so that customers of all abilities are able to engage with technology while searching for work and educational opportunities.

- (4) Method(s) the VR agency uses to ensure that personnel 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.  
[text box]

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 are able to communicate directly with customers and community members in their native or preferred language. Two staff speak ASL and two speak 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. Other translation services are accessed as needed such as in person, live translation for classes in the training center.

- (5) 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.  
[text box]

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 regularly coordinated with transition services provided under the Individuals with Disabilities Education Act (IDEA).

There is active information sharing and coordinated planning between OCB and regional programs, OVRS, and education and health care organizations throughout the state. Partners join in planning outreach efforts, coordinate referrals of potentially eligible students for VR, and implement process improvements for state-wide assessment & training 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 pre-employment transition services for students eligible or potentially eligible for vocational rehabilitation services, begins around age 16 (and as early as age 14), and for those students wanting access to the full breadth of VR services, 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. There is no maximum age for which individuals may apply for VR services; however, there is a minimum and maximum age at which Pre-Employment Transition services are available to students with disabilities who are eligible or potentially eligible for VR services (age 14-21).

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 postsecondary 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, paid work experiences, and extra-curricular opportunities to more fully develop self-advocacy and independent living skills. OCB's transition counselors conduct outreach and ongoing consultation statewide to teachers of the visually impaired, students, families, and others in the education community. Students who are blind,

Deaf/blind, and visually impaired are 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 thus offers the Summer Work Experience Program (SWEP) to complement the learning that is available through the 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 after they enter into their IPE. Each client is evaluated individually to determine his or her eligibility and potential to engage in supported employment. VR services occur prior to and include job placement services. Supported Employment (on-going supports) begin after employment begins. Supported Employment services and extended services are available to youth with most significant disabilities after employment begins. 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.

From the 2023 CSNA:

The top three vocational barriers for young adults experiencing vision loss were identified as part of the CSNA survey activities. Survey responses asking about barriers to transitioning from school to work of students (n=4) was reported as the following:

Advocacy, both self and by the agency for employment. Lack of tech skills. For Business Enterprise, not many people came back to the building/café where they worked. VRC helped explore open avenues to figure out how to proceed. Appreciate

having a VRC that was on board to develop a new plan and move forward with anything that would work.

Couldn't conceive of doing anything besides the old work they had done. They did a career assessment to figure out transferable skills Transportation, asking for a driver. Need transportation for outreach.

OCB's goals and strategies work to address these overarching barriers - and will remain viable strategies for OCB moving forward. The relevant Goals and strategies include: Goal 3: Expand Pre-Employment Transition Services for students with disabilities who are potentially eligible or eligible for VR services. The agency identifies several tactical ways of achieving goal three including:

- 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;
- 2) Develop creative and collaborative partnerships to increase access to Pre-ETS services for students in rural or otherwise underserved communities;
- 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; and
- 4) Maintain consistent communication with secondary and postsecondary education providers to ensure OCB services address current and anticipated technology and skill competencies necessary for postsecondary success in a rapidly changing social and technological environment.

These goals and strategies address the higher level needs of youth while the tactical and operational aspects will follow. The youth responses tended to focus on the immediate needs and while the agency can address those in IPEs, there are higher level systems the agency can address through broader goals defined above.

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.

**COOPERATION, COLLABORATION, AND COORDINATION (Section 101(a)(11) of the Rehabilitation Act)**

**(j) Coordination with Education Officials.** In accordance with the requirements in section 101(a)(11)(D) of the Rehabilitation Act—

- (1) Describe plans, policies, and procedures for coordination between the designated State agency and education officials responsible for the public education of students with disabilities, that are designed to facilitate the transition of the students with disabilities from the receipt of educational services in school to the receipt of vocational rehabilitation services, including pre-employment transition services.

[text box]

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 ensure 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 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. The Oregon Commission for the Blind has a Cooperative Agreement with the Oregon Department of Education and Vocational Rehabilitation that facilitates outreach and provision of services.

OCB has a current agreement with State Education Agency (Oregon Department of Education, ODE). Per this agreement, ODE and OCB follow the coordinated documentation procedures in accordance and consistent with Section 511 of the Rehabilitation Act and C.F.R. Part 397. This includes but is not limited to, notification requirements, documentation requirements, explanation of services and other details.

Students with disabilities who are eligible or potentially eligible, are able to access OCB's Pre-Employment Transition Services (Pre-ETS). Students begin receiving Pre-ETS prior to receiving Vocational Rehabilitation Services. All potentially eligible students may receive Pre-ETS regardless if they meet VR eligibility requirements. When students turn 16 they also become eligible to apply for the Summer Work Experience Program (SWEP). To participate in SWEP, students apply for VR and must be eligible for VR services in order to attend. All students who apply for VR Services, starting as early as 14 years, participate in the application, eligibility, and plan development process. Students collaborate with their VRC to develop an Individualized

Plan for Employment (IPE) within 90 days of eligibility, which matches the timeline for adult services.

For outreach to and identification of students, staff present at multiple conferences and events throughout the state that have targeted audiences such as school administrators, transition teachers, case management entities and family members. OCB partners with community and parents groups throughout the state, and provide trainings and presentations when appropriate. OCB uses demographic and anecdotal data sources to identify areas in need of service, in part based on the level of information requests about Pre-ETS coming from that area. OCB staff attached to Pre-ETS services regularly communicate with staff from Oregon's General VR agency, appropriate school district personnel and community partners to understand OCB's role and resources and supports available to designated Pre-ETS and Transition students.

- (2) Describe the current status and scope of the formal interagency agreement between the VR agency and the State educational agency. Consistent with the requirements of the formal interagency agreement pursuant to 34 CFR 361.22(b), provide, at a minimum, the following information about the agreement:
  - (A) Consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services and other vocational rehabilitation services;
  - (B) Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their individualized education programs (IEPs) under section 614(d) of the Individuals with Disabilities Education Act;
  - (C) The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and pre-employment transition services;
  - (D) Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must 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;
  - (E) Coordination necessary to satisfy documentation requirements set forth in 34 CFR part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and

(F) Assurance that, in accordance with 34 CFR 397.31, neither the SEA nor the local educational agency will enter into a contract or other arrangement with an entity, as defined in 34 CFR 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.  
[text box]

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 postsecondary 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 of students with disabilities from school to post-school activities, including pre-employment 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.

**(k) Coordination with Employers.** In accordance with the requirements in section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.  
[text box]

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. 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, 2 full-time Business Relations Coordinators, 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 presented at the 2023 NET Summit. OCB will continue working with NET on 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.

**(I) Interagency Cooperation with Other Agencies.** In accordance with the requirements in section 101(a)(11)(C) and (K), 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 to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

- (1) State programs (designate lead agency(ies) and implementing entity(ies)) carried out under section 4 of the Assistive Technology Act of 1998;  
[text box]

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.

- (2) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;  
[text box]

OCB does not have cooperative agreements with programs carried out by the Under Secretary for Rural Development of the Department of Agriculture.

- (3) Non-educational agencies serving out-of-school youth;  
[text box]

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.

Through collaboration with these and other non-educational entities and non-workforce entities, creative wraparound supports can be brought into place when needed to support and assist OCB's out of school youth to obtain positive employment outcomes. These supports include:

scholarships, mentoring, educational activities and more that have had a benefit on the positive employment outcomes for OCB's out of school youth.

- (4) State use contracting programs;  
[text box]

OCB does not currently have cooperative agreements with State use contracting programs.

- (5) State agency responsible for administering the State Medicaid plan under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.);  
[text box]

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).

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. OCB has not entered into separate formal agreements with OHA or DHS at this time. OCB receives and provides technical assistance and information and referral from and with OHA, SPD and DDS in order to maximize OCB client benefit from Medicaid and Medicaid related services and resources. Medicaid acts as an additional support for appropriate OCB clients in establishing stability to improve positive employment outcomes for individuals with the most significant disabilities.

- (6) State agency responsible for providing services for individuals with developmental disabilities;  
[text box]

OCB is committed to collaboration with DHS, SPD, DDS, ODE 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.

OCB clients benefit from strong working relationships with these service providers in Oregon. OCB, 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 shared clients. Moving forward, OCB will continue to work with ODDS and I/DD service delivery systems 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. OCB staff collaborate with these state and community service providers to share information, best practices and resources in order to maximize positive employment outcomes for OCB's IDD clients.

(7) State agency responsible for providing mental health services;  
[text box]

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 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. OCB has supported the expansion of evidence based supported employment services through work with county mental health organizations. 35 out of Oregon's 36 counties provide IPS services to Oregonians, and this has been helpful to OCB staff in connecting clients to specialized resources and services when appropriate. OCB staff have and continue to access resource and referral services, technical training and structural supports that exist within Oregon's IDD services infrastructure. This ongoing relationship help OCB staff build competency and appropriate skill sets needed to impact employment and retention outcomes for OCB clients.

While continuing to expand and support employment outcomes, the quality of those outcomes, and the skills of the employment service providers, OCB is looking ahead to increasing the capacity of community rehabilitation programs and providers working with IDD clients. OCB will continue to build on, expand and develop its existing CRP and service provider training for ongoing improvement. Access to the specialized expertise of these and other mental health providers throughout the state have increased positive employment outcomes for OCB clients, and helped build out systems for OCB clients needing mental health resources to achieve and retain competitive, integrated employment goals.

- (8) Other Federal, State, and local agencies and programs outside the workforce development system; and  
[text box]

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 engage 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 many 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 has developed and maintains cooperative agreements and relationships where necessary with federal, state and local agencies not carrying out activities through the statewide public workforce system. OCB maintains a cooperative agreement with the Oregon Department of Education in this way.

OCB's formal and informal cooperative agreements include, but is not limited to, the partnerships that follow: OCB actively partners with Centers for Independent Living (CILs) 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 ensure 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 engages with tribal vocational rehabilitation programs in order to better serve our mutual clients through enhanced communication and understanding of specific needs. OCB has cooperative agreements in place with the following Tribal entities: The Confederated Tribes of the Umatilla Indian Reservation Tribes, and The Confederated Tribes of Warm Springs, The Confederated Tribes of the Grand Ronde.

OCB services and corresponding outcomes for OCB's clients have improved through these partnerships. OCB has benefited from work with the CIL's by accessing services and resources from their system as they become available and as appropriate. This provides OCB with additional flexibility in service delivery. Agreements with Tribal entities have resulted in improved communication and enhanced outcomes, while building staff capacity with this population. Relationships with Oregon's community college system have improved communication and streamlined referral to services and resources for OCB clients and staff. Benefits from these varied relationships, partnerships and agreements help create efficient and effective referral and service delivery - including joint planning when appropriate, provide coordinated and non-duplicated services, leverage funding and enhance wrap around supports for OCB clients that contribute to positive competitive, integrated employment outcomes.

(9) Other private nonprofit organizations.  
[text box]

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. Blindsight, Inc.: OCB has an on-going partnership with Blindsight, 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 Blindsight, Inc. for community resources and blindness related supports for clients.

Easter Seals, Connecting Communities Program: OCB works collaboratively with the Connecting Communities program, which provides training/education to non-native English speaking participants focusing on employment. Their program consists of bilingual 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.

The cooperative relationships vary from information and referral relationships to fee-for-service and pay for performance relationships. OCB follows State of Oregon contractual processes when establishing contracts for services.

OCB works with the Office of Contracts and Procurement to develop contracts. The fee for services is determined by fair market value. Additionally, these contracts follow state Rules and Policies that simplify, clarify and modernize Public Contracting pursuant to ORS 279A.015(1). These Rules provide a foundation for ethical and fair dealing in Public Contracting, designed to instill public confidence pursuant to ORS 279A.015(2). The Oregon Department of Justice also reviews contracts as an additional oversight.

Partnering and collaborating with Private Non-Profit organizations enhances and expands OCB's 'toolkit' of resources and services available to clients. In developing these relationships, OCB staff are able to better 'meet clients where they are at' and respond to individual client needs in a more individualized manner. In this way, OCB is better able to realize positive employment and retention outcomes for individual clients and OCB's business partners. These

collaborations, services and contracts will enhance OCB's capacity to respond to specific populations with regards to disability, cultural and linguistic and communication preference.

## VOCATIONAL REHABILITATION CERTIFICATIONS AND ASSURANCES

### CERTIFICATIONS

<b>States must provide written and signed certifications that:</b>	
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 title IV of WIOA, <sup>15</sup> and its State Plan supplement under title VI of the Rehabilitation Act;
2.	In the event the designated State agency is not primarily concerned with vocational and other rehabilitation of individuals with disabilities, the designated State agency must include a designated State unit for the VR program (Section 101(a)(2)(B)(ii) of the Rehabilitation Act). 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 or the designated State unit when the designated State agency has a designated State unit) <sup>16</sup> agrees to operate and is responsible for the administration of the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan <sup>17</sup> , the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations <sup>18</sup> , policies, and procedures established by the Secretary of Education. Funds made available to States under section 111(a) of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;
3.	As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency or the designated State unit when the designated State agency has a designated State unit, agrees to operate and is responsible for the administration of the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan <sup>19</sup> , the Rehabilitation Act, and all applicable regulations <sup>20</sup> , policies,

<sup>15</sup> Public Law 113-128.

<sup>16</sup> All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

<sup>17</sup> 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.

<sup>18</sup> 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 at 34 CFR part 361.

<sup>19</sup> 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.

<sup>20</sup> Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 CFR part 363.

<b>States must provide written and signed certifications that:</b>	
	and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;
4.	The designated State unit, or if not applicable, the designated State agency 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, and is responsible for the administration of the VR program in accordance with 34 CFR 361.13(b) and (c);
5.	The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.
6.	All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.
7.	The (enter title of State officer below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;
8.	The (enter title of State officer below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;
9.	The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

## **ASSURANCES**

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner, 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:

<b>The State Plan must provide assurances that:</b>	
1.	<b>Public Comment on Policies and Procedures:</b> The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the

<b>The State Plan must provide assurances that:</b>	
	VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.
2.	<b>Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement:</b> 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 State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 C.F.R. 76.140.
3.	<p><b>Administration of the VR services portion of the Unified or Combined State Plan:</b> The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:</p> <ul style="list-style-type: none"> <li>(n) the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.</li> <li>(o) either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.</li> <li>(p) 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.</li> <li>(q) 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).</li> <li>(r) as applicable, 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.</li> <li>(s) as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.</li> <li>(t) statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.</li> <li>(u) the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.</li> <li>(v) all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.</li> <li>(w) the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.</li> <li>(x) the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate,</li> </ul>

<b>The State Plan must provide assurances that:</b>	
	<p>and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.</p> <p>(y) 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 as set forth in section 101(a)(18)(A).</p> <p>(z) the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.</p>
4.	<p><b>Administration of the Provision of VR Services:</b> The designated State agency, or designated State unit, as appropriate, assures that it will:</p> <p>(i) comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act.</p> <p>(j) 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.</p> <p>(k) 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 or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.</p> <p>(l) determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.</p> <p>(m) comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.</p> <p>(n) 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.</p> <p>(o) 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.</p> <p>(p) 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 sections 101(a)(14) and 511 of the Rehabilitation Act.</p> <p>(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.</p>

<b>The State Plan must provide assurances that:</b>	
	<p>(j) with respect to students with disabilities, the State:</p> <p>(i) has developed and will implement,</p> <p>(A) strategies to address the needs identified in the assessments; and</p> <p>(B) strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and</p> <p>(ii) has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25), and 113).</p> <p>(iii) shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.</p>
5.	<p><b>Program Administration for the Supported Employment Title VI Supplement to the State plan:</b></p> <p>(c) 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.</p> <p>(d) The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.</p>
6.	<p><b>Financial Administration of the Supported Employment Program (Title VI):</b></p> <p>(c) 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)(H) and (I) of the Rehabilitation Act.</p> <p>(d) The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.</p>

**The State Plan must provide assurances that:**

7.	<p><b>Provision of Supported Employment Services:</b></p> <p>(c) The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.</p> <p>(d) The designated State agency assures that 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 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)(7)(C) and (E) of the Rehabilitation Act.</p>

## **APPENDIX 1: PERFORMANCE GOALS**

**Appendix 1: 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.

Include the state's expected levels of performance relating to the performance accountability indicators based on primary indicators of performance described in section 116(b)(2)(A) of the Workforce Innovation and Opportunity Act (WIOA).

	Title I – Adult Program			
	Program Year: 2025-26		Program Year: 2026-27	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	68.2%		-	
Employment (Fourth Quarter after Exit)	68.6%		-	
Median Earnings (Second Quarter after Exit)	\$6,883		-	
Credential Attainment Rate	60.5%		-	
Measurable Skill Gains	55.1%		-	

	Title I – Dislocated Worker Program			
	Program Year: 2025-26		Program Year: 2026-27	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	69.4%		-	
Employment (Fourth Quarter after Exit)	66.6%		-	
Median Earnings (Second Quarter after Exit)	\$7,100		-	
Credential Attainment Rate	66.8%		-	
Measurable Skill Gains	55.0%		-	

	Title I – Youth Program			
	Program Year: 2025-26		Program Year: 2026-27	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit) <sup>21</sup>	63.5%		-	
Employment (Fourth Quarter after Exit) <sup>22</sup>	61.7%		-	
Median Earnings (Second Quarter after Exit)	\$4,259		-	
Credential Attainment Rate	56.1%		-	
Measurable Skill Gains	51.5%		-	

<sup>21</sup> For Title I Youth programs, employment, education or training.

<sup>22</sup> For Title I Youth programs, employment, education or training.

	Title II – Adult Education and Family Literacy Act Program			
	Program Year: 2024-25		Program Year: 2025-26	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	32.00%		32.40%	
Employment (Fourth Quarter after Exit)	22.00%		22.40%	
Median Earnings (Second Quarter after Exit)	\$3,600		\$3,650	
Credential Attainment Rate	15.50%		16.00%	
Measurable Skill Gains	34.00%		34.50%	

	Wagner-Peyser Act Employment Service Program			
	Program Year: 2024-25		Program Year: 2025-26	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	68.2%		-	
Employment (Fourth Quarter after Exit)	68.0%		-	
Median Earnings (Second Quarter after Exit)	\$7,000		-	
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable

	Vocational Rehabilitation Program – ODHS Vocational Rehabilitation			
	Program Year: 2024-25		Program Year: 2025-26	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit) <sup>22</sup>				
Employment (Fourth Quarter after Exit) <sup>22</sup>				
Median Earnings (Second Quarter after Exit) <sup>23</sup>				
Credential Attainment Rate				
Measurable Skill Gains				

	Vocational Rehabilitation Program – Oregon Commission for the Blind			
	Program Year: 2024-25		Program Year: 2025-26	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit) <sup>22</sup>	51.0%		52%	
Employment (Fourth Quarter after Exit) <sup>22</sup>	43.0%		44%	
Median Earnings (Second Quarter after Exit) <sup>24</sup>	\$3,600		\$3,800	
Credential Attainment Rate	38.0%		36%	
Measurable Skill Gains	32.0%		34%	

	All WIOA Core Programs			
	Program Year:		Program Year:	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Effectiveness in Serving Employers				

Additional Indicators of Performance
1.
2.
3.
4.

## COMBINED STATE PLAN PARTNER PROGRAMS

## **VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAM**

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.<sup>24</sup> 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.

<sup>24</sup> 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.

**SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM,  
EMPLOYMENT AND TRAINING (SNAP E&T)**

**SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM, EMPLOYMENT AND TRAINING (SNAP E &T) and WORK PROGRAMS AUTHORIZED UNDER SECTIONS 6(d)(4) and 6 6(o) OF THE FOOD AND NUTRITION ACT OF 2008**

(OMB Control Number: 0584-0083)

- (a) General Requirements<sup>27</sup>: 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:
- (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;

Oregon's SNAP E&T Program submits an annual SNAP E&T State Plan for review, comment, and approval by Food and Nutrition Services (FNS). The information contained in this section of the WIOA Plan is included in the approved Federal Fiscal Year (FFY) 2024 SNAP E&T State Plan. Subsequent year SNAP E&T State Plans will be submitted for review, comment, and approval by FNS and will be made available upon request.

- 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. These components are included in the list of Federally allowable components. Oregon allows the contracted providers to select from the list of Federally allowed components and determine, based on their organization, which to offer to SNAP E&T participants.
  - Supervised Job Search
  - Job Search Training
  - Job Retention
  - Self-Employment Training
  - Basic Education/Foundational Skills Instruction
  - Career/Technical Education or other Vocational Training
  - English Language Acquisition:
  - Integrated Education and Training/Bridge Program
  - Work Readiness Training

- Work Activity
  - Internship
  - Internship with Subsidized Employment
  - Pre-Apprenticeship
  - Apprenticeship
  - Apprenticeship with Subsidized Employment
  - On-the-job Training
  - WorkFare
- FFY 2024 total program/admin cost (for all SNAP E&T components): \$58,892,592.12.
  - FFY 2024 total participant support service cost (for all SNAP E&T components): \$6,574,602.40.
  - FFY 2024 total cost for all components, including federal and non-federal sources: \$65,467,194.52.
- 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.
  - All of Oregon’s SNAP E&T Contracted Providers attest “Education and Training Components being offered by the Contractor are not supplanting education services otherwise available to the SNAP E&T participant” in the following documents.
    - The annual SNAP E&T Provider Proposal, when selecting to provide any educational components. The attestation must be completed for each educational component provided.
    - The SNAP E&T Contract between Oregon Department of Human Services (ODHS) and the Provider.
    - The SNAP E&T quarterly invoice.
    - All SNAP E&T Providers, during the SNAP E&T Program Review, are asked to describe how they are not supplanting.
  - Guidance is provided in the Oregon SNAP E&T Provider Handbook: “There are specific rules regarding what can be charged to an E&T education component. Activities charged to E&T may not supplant non-federal funds for existing educational services and activities and E&T may not be charged more than what the general public would pay for the same service. There are also regulations pertaining to students enrolled in institutes of higher education and their eligibility for SNAP at 7 CFR 273.5.”
  - As outlined in Oregon’s SNAP E&T Handbook, when approving tuition payments, “SNAP E&T providers must consider lower-cost alternatives. It is the program’s expectation that SNAP E&T providers and participants work collaboratively to seek alternative resources that are reasonably available to the participant in order to engage in activities. Tuition payments are allowable when they are reasonable, limited, necessary to perform E&T

components and meets the additional criteria outlined below. All tuition payments must be related to their SNAP E&T case plan, within the provider’s budget and will be considered on an individual basis. Payments for any outstanding or past due tuition is NOT allowed.”

- Additionally, all SNAP E&T Contracted Providers attest in their annual SNAP E&T Proposal, when selecting to provide any educational components, they do not charge Oregon SNAP E&T more than they would charge any other program.

(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;

<b>SNAP E&amp;T   FFY 2024 budget</b>		
<b>Source type</b>	<b>Funding Sources</b>	<b>Distribution of Expenses</b>
Federal	100% Federal Grant	\$2,250,292.00
Federal	100% Federal Grant - Additional Funds	\$500,000.00
Federal	ABAWD Pledge Funds	\$4,857,975.00
Federal	50% Administrative	\$28,419,696.06
Non-Federal	50% Administrative	\$28,419,696.06
Federal	50% Participant Reimbursements	\$3,287,301.20
Non-Federal	50% Participant Reimbursements	\$3,287,301.20
<b>Total</b>		<b>\$71,022,261.52</b>

(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;

Oregon is a voluntary state, and all Work Registrants are exempt from being assigned by the State agency to a SNAP E&T program. Oregon evaluates the exemptions annually and the decision to be a voluntary state annually.

(4) The characteristics of the population the State agency intends to place in E&T;

Individuals with an ABAWD status, homeless, veterans, students, single parents, returning citizens, underemployed, those that reside in rural areas, youth ages 16 and 17 who are either the head of household on their SNAP case or have parental/guardian permission to engage in the program, anyone ages 18 and above, and individuals who are receiving SNAP and not TANF.

(5) The estimated number of volunteers the State agency expects to place in E&T;

33,486

(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;

ODHS contracts with statewide and local providers for services to support all SNAP E&T participants in all areas of the state.

<b>SNAP E&amp;T Contracted Providers</b>	<b>Geographic Area</b>	<b>Components Offered</b>
Central City Concern	Multnomah, Clackamas, Washington Counties	Supervised Job Search, Job Search Training, Job Retention, Work Readiness, Work Activity
Portland State University	Multnomah, Clackamas, Washington Counties	Job Search Training, Job Retention, Self-Employment Training, Career/Technical Education or other Vocational Training, Short-Term Training, Work Readiness Training

Outside In	Multnomah County	Supervised Job Search, Job Search Training, Job Retention, Basic Education/Foundational Skills, Career/Technical Education or other Vocational Training, Short-Term Training, Work Readiness Training, Internship, Pre-Apprenticeship, Apprenticeship, , Work Activity
Stone Soup	Multnomah and Washington Counties	Supervised Job Search, Job Search Training, Job Retention, Short-Term Training, Work Readiness Training
Dress for Success	Clackamas, Marion, Multnomah, Polk, Yamhill, and Washington Counties	Job Search Training, Job Retention
Meadowlark Employment Services Inc.	Multnomah, Clackamas, Washington Counties	Supervised Job Search, Job Retention, Career/Technical Education or other Vocational Training, Work Readiness Training, Work Activity, On-The-Job Training
New Avenues for Youth, Inc.	Multnomah County	Supervised Job Search, Job Search Training, Job Retention, Basic Education/Foundational Skills, Work Readiness Training
Work Systems Inc	Multnomah and Washington Counties	Job Search Training, Career/Technical Education or other Vocational Training, Pre-Apprenticeship
Willamette Workforce Partnership	Marion, Polk, Yamhill, and Linn Counties	Supervised Job Search, Job Search Training, Career/Technical Education or other Vocational Training, Short-Term Training, Work Readiness Training, Internship
Northwest Hub	Marion County	Short-Term Training, Internship, Internship with Subsidized Employment
Salem Alliance Baraka English	Marion, Polk Counties	English Language Acquisition

Sparrow	Marion County	Supervised Job Search, Job Search Training, English Language Acquisition, Apprenticeship, Apprenticeship with Subsidized Employment
Community Services Consortium	Linn, Benton, Lincoln and Polk Counties	Supervised Job Search, Job Search Training, Job Retention, Work Activity, Internship, On the Job Training, Pre-Apprenticeship, Apprenticeship, Self-Employment Training, Basic Education/ Foundational Skills Instruction, Career Technical Education or Other Vocational Training, Short-Term Training, English Language Acquisition, Integrated Education and Training/ Bridge Programs, Work Readiness Training
COI - Community Outreach Inc	Benton County	Supervised Job Search, Job Search Training
Pathfinder Clubhouse	Benton, Linn, and Lincoln Counties	Supervised Job Search, Job Search Training, Job Retention, Work Readiness Training, Work Activity
Lane Co Health & Human Services	Lane County	Supervised Job Search, Job Search Training, Job Retention, Career/Technical Education or other Vocational Training
Goodwill Lane Co & South Coast	Lane County	Supervised Job Search, Job Search Training, Career/Technical Education or other Vocational Training, Short-Term Training, Work Activity
Chadwick Clubhouse	Douglas County	Supervised Job Search, Job Search Training, Job Retention, Work Readiness Training, Work Activity
Goodwill Lane Co & South Coast	Coos and Curry Counties	Supervised Job Search, Job Search Training, Career/Technical Education or other Vocational Training, Short-Term Training, Work Activity

Klamath Works	Klamath County	Supervised Job Search, Job Search Training, Job Retention, Work Readiness Training, Work Activity, On-the-Job Training
Baker County School District 5J	Clatsop, Columbia, Tillamook, Yamhill, Polk, Marion, Lincoln, Benton, Linn, Hood River, Sherman, Gilliam, Wheeler, Wasco, Jefferson, Deschutes, Crook, Umatilla, Morrow, Wallowa, Union, Baker, Grant, Harney, and Malheur Counties	Supervised Job Search, Job Search Training, Basic Education/Foundational Skills Instruction, Career/Technical Education or other Vocational Training, Work Readiness Training
Clackamas Workforce Partnership	Clackamas County	Job Search Training, Career/Technical Education or other Vocational Training
Clackamas County CFCC	Clackamas County	Supervised Job Search, Job Search Training, Career/Technical Education or other Vocational Training, Short-Term Training, Internship, Work Activity
Home Plate	Washington County	Supervised Job Search, Job Search Training, Job Retention, Self-Employment Training, Work Readiness Training
Centro Cultural	Washington, Marion, Polk, and Yamhill Counties	Supervised Job Search, Job Search Training, Self-Employment Training, Basic Education/Foundational Skills, English Language Acquisition, Work Readiness Training, On-the-Job Training
OED - STEP	Statewide	Supervised Job Search, Job Search Training, Job Retention, Work Readiness Training, On-The-Job Training; Funding: Basic Education/Foundational Skills, Career/Technical Education or Other Vocational Training, Short-Term Training, English Language

		Acquisition
OED - ABAWD	In Oregon counties implementing SNAP Time Limits	Supervised Job Search, Job Search Training, Job Retention, Career/Technical Education or other Vocational Training, Work Readiness Training, On-The-Job Training
Portland Community College (Community College Consortia)	Statewide	Supervised Job Search, Job Search Training, Job Retention, Work Activity, Internship, On the Job Training, Pre-Apprenticeship, Apprenticeship, Self-Employment Training, Basic Education/ Foundational Skills Instruction, Career Technical Education or Other Vocational Training, Short-Term Training, English Language Acquisition, Integrated Education and Training/ Bridge Programs, Work Readiness Training

(7) The method the State agency uses to count all work registrants as of the first day of the new fiscal year;

Oregon uses the Work Registrant definition described in 7 CFR 273.7(a) and in the Oregon Administrative Rule (OAR) 461-130-0310. To gather the number of Work Registrants in the State as of the 1st day of October, the criterion in the rules is applied to all open SNAP cases. Individual data details are gathered for anyone who is 16 or 17 and head of household on the SNAP case, or for those who are 18 through 59 years old. Information includes exemption status such as: student status, disability status, pregnancy information, parenting information, if providing care for a disabled individual, and if the participant is engaged in drug or alcohol treatment rehabilitation program(s).

(8) The method the State agency uses to report work registrant information on the quarterly Form FNS-583;

The same criterion is applied as outlined above. In the OregONEligibility (ONE) system, Work Registrant data is pulled using individual level information, to prevent any duplication of participants between reporting months and fiscal years. Each month's individual level data is

compared with previous month's individual level data to prevent duplicate counting.

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<sup>27</sup> 7 CFR § 273.7(c)(6).

- (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 same criterion is applied as outlined above. In Oregon's ONE system, Work Registrant data is pulled using individual level information, to prevent any duplication of participants between reporting months and fiscal years. Each month's individual level data is compared with previous month's individual level data to prevent duplicate counting.

- (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 SNAP Employment and Training Team is a Statewide policy team who administers the E&T program. The SNAP E&T Team is separate from SNAP Policy. The SNAP E&T Team is in constant communication and coordination with the SNAP Policy team. This is accomplished by developing, sharing and reviewing work products that cross over between the E&T and SNAP Programs. The OregONEligibility (ONE) System which is the State Agency's certification system, has a daily interface (batch) with the Oregon Employment Department's iMatchSkills™ (iMS) system. SNAP E&T Providers enter all SNAP E&T required participant data into iMS.

ODHS requires quarterly invoicing to ensure SNAP E&T Providers are spending in accordance with their allocated FFY budget. The invoice also monitors how many unduplicated participants are served which is validated through iMatchSkills.

Oregon requires all SNAP E&T providers to use iMatchSkills, which records all components and support services provided and is a central case management system. ODHS pulls robust data reports to analyze the performance of each SNAP E&T provider.

ODHS also engages with the state and local workforce boards, which allows for feedback from other community partners as to the performance of SNAP E&T programs.

Oregon has the Workforce System Executive Team (WSET) that includes executive managers from Oregon Workforce Partnership (Title 1) Higher Education Coordinating Commission (Title

II), the Oregon Employment Department (Title III), Vocational Rehabilitation (Title IV) and Self-Sufficiency Programs at ODHS. This team meets regularly to review how the state workforce system is operating, to coordinate efforts among the state agencies. This team has authority to make significant changes to how workforce programs operate in Oregon and to collaborate on projects. WSET uses data to inform their discussions and decisions and to steer how budgets are spent and what programs are prioritized.

In accordance with 7 CFR 273.7(c)(3), State agencies have the option to offer a conciliation period to noncompliant E&T participants. Oregon operates a voluntary SNAP E&T Program so no compliance/non-compliance reporting and no conciliation process is relevant or necessary for the state.

(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;

There are several avenues for consultation with all Workforce Development agencies in Oregon and the outcomes include aligning and designing respective workforce programs, including SNAP E&T. In addition, there is a focus on the prevention of 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, as well as designing its SNAP E&T program. In addition, the Deputy Directors of the HECC (Higher Education Coordinating Commission), OED (Oregon Employment Department), VR (Vocational Rehabilitation), and SSP (Self-Sufficiency Programs) work closely together to coordinate efforts and align and design their respective programs, including the SNAP E&T program.

ODHS is part of the state workforce board and receives input from the workforce boards and other workforce agencies in the delivery of SNAP E&T programs. Employers and labor organizations are part of the state workforce boards and offer advice on what is needed in Oregon's system.

The SNAP E&T team includes staff members identified as District Points. District Points are the central point of contact to liaison as subject matter experts of the SNAP E&T program to support ODHS leadership, staff, and SNAP E&T Providers within their specifically assigned District.

The District Point regularly communicates directly with the SNAP E&T Providers through email, phone, virtual formats, or in-person. The information shared may include but is not limited to; new guidance, compliance issues, on-going technical assistance, participant information, miscellaneous information, budget, contracting or personnel questions or concerns, meeting details, or any other topic that may need to be addressed or shared.

The SNAP E&T team facilitates monthly Statewide SNAP E&T Steering Committee meetings. Attendance is required for all SNAP E&T providers. This meeting is used to communicate program delivery and/or implementation changes, requests for information, SNAP E&T Navigator updates, system changes, and incorporates time for questions and answers. This allows for robust community engagement from all steering committee members regarding any new/upcoming program, policy, and/or process changes.

District SNAP E&T Steering Committee meetings are facilitated by each service delivery area leadership. The SNAP E&T Team District Point attends these meetings to provide program updates and any technical assistance. Local leadership and SNAP E&T Navigators assigned to the service delivery area provide updates regarding eligibility program changes or any process changes. SNAP E&T Providers offer updates on their programs and changes to processes. These meeting ensure providers are connecting, collaborating, and creating opportunity to build upon each other's services.

The SNAP E&T Team maintains a SNAP E&T Provider Handbook outlining Oregon's guidelines and expectations for implementing and running a STEP program. The handbook provides one location for SNAP E&T Providers to access all guidance for the SNAP E&T program. This handbook is updated at least once a year, prior to the new FFY, and then as needed with new program or process guidance.

The SNAP E&T Team develops a STEP Provider Proposal each FFY. SNAP E&T Providers must submit a SNAP E&T Provider Proposal every FFY to become or continue being part of Oregon's SNAP E&T Provider Network. The proposal outlines the process in which a SNAP E&T participant flows through a SNAP E&T provider's program from beginning to end. It also outlines all administrative processes to meet program requirements and details of each SNAP E&T service component that will be provided to SNAP E&T participants. SNAP E&T Provider Proposals are extensively reviewed ensuring all elements of the proposer's SNAP E&T program are outlined. This includes how the SNAP E&T services will be targeted to meet the specific needs of the SNAP E&T participants case plan and all of the costs associated with implementing their proposal.

(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 does not currently have any Tribes operating SNAP E&T programs. However, conversations continue with the ODHS Tribal Liaison for future partnerships. In addition, through continued outreach efforts and tribal engagement, ODHS ensures programming, services and policies meet the needs of Oregon tribal children, families, and elders.

Oregon continues to consult with Oregon's Tribes to ensure equitable programming access across the state. Oregon recently updated and implemented the Tribal Consultation and Urban Indian Health Program Confer Policy. The updates include a commitment by the SNAP E&T program to coordinate the development of the State Plan each Federal Fiscal Year by including Oregon's Tribes in the monthly SNAP E&T Statewide Steering Committee to take part in development, implementation and maintenance discussions of the program.

SNAP E&T services are available statewide, including to tribal members.

- (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

Oregon operates voluntary SNAP E&T programming, so no conciliation process is necessary.

- (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.

ODHS can pay approved providers who meet the listing and provider requirements and pass a background check. ODHS bases the monthly maximum childcare rates on a statewide market survey of childcare providers and the amount most of them charge in their area.

The Oregon Secretary of State Administrative Rules site outlines the Employment Related Day Care (ERDC) payment rates in accordance with the CCDBG; this [link](#) the current version.

- (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 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. Providers in their contracts with ODHS 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.

Oregon allows contracted partners and state staff to determine on a case-by-case basis, the type and amount of support services and/or transportation assistance provided to participants. The cost of the service varies, and organizations take into consideration travel distances, public transportation costs (individual tickets versus monthly), costs of purchasing versus renting work tools, new versus used uniforms, and a number of other factors.

(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.

Information regarding all costs to be reimbursed is found within Oregon's FFY 2024 SNAP E&T State Plan.

Oregon's FFY 2024 SNAP E&T State Plan has been reviewed and approved by FNS.

(b) **Able-bodied Adults without Dependents (ABAWD)<sup>28</sup>**: 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:

(1) Its pledge to offer a qualifying activity to all at-risk ABAWD applicants and recipients;

The State agency will use the pledge funds to defray the costs of offering every at-risk ABAWD a slot in a qualifying component.

The cost of serving at-risk ABAWDs is not an acceptable reason for failing to live up to the pledge. The State agency will make a slot available and the ABAWD must be served even if the State agency exhausts all of its 100 percent Federal funds and must use State funds.

While a participating State agency may use a portion of the additional funding to provide E&T services to ABAWDs who are not at-risk, the State agency guarantees that at-risk ABAWDs are provided with opportunities by the State agency each month to remain eligible beyond the 3-month time limit.

The State agency will notify FNS immediately if it realizes that it cannot obligate or expend its entire share of the ABAWD allocated funds, so that FNS may make those funds available to other participating pledge States within the fiscal year.

The State agency will be ready on October 1<sup>st</sup> to offer and provide qualifying activities and services each month an ABAWD is at-risk of losing their benefits beyond the 3-month time limit.

(2) Estimated costs of fulfilling its pledge;

Oregon anticipates the cost of fulfilling the ABAWD Pledge in FFY 2024: \$4,857,975.00. The following outlines the cost areas:

1. Oregon Employment Department (OED) (contracted services)
  - a. Education/Information: \$1,204,000.00
  - b. Workfare: \$178,200.00
  - c. Program/Administrative Costs: \$1,875,000.00
2. Oregon Department of Human Services (positions): \$1,500,775.00
3. Additional Workfare Sites (contracted services): \$100,000.00

(3) A description of management controls in place to meet pledge requirements;

Oregon identifies individuals with an ABAWD status in the ONE Eligibility system. The ONE system asks a series of questions throughout data collection to determine if an individual meets the definition of an ABAWD (age range as defined by FNS, not having a minor child on the SNAP case). Those who are deemed to meet the criteria are identified as such in the individual summary screen. The ONE system displays ABAWD counting month information in the ABAWD Month Tracker screen. This screen displays the number of countable months the individual has received in the three-year period, along with the month/year of the countable month. Individuals are considered at-risk when they have received the second countable month.

When an individual is determined to have an ABAWD status, they are referred to Oregon's ABAWD Team. The ABAWD Team then connects with the individual to discuss the ABAWD Program requirements including work activity hours needed to maintain SNAP benefits. This also includes clarifying any exemptions and making referrals to OED for any individual determined to have an ABAWD status.

Once the individual attends the ABAWD orientation with OED and completes the assessment, they work together with the OED ABAWD Coach to collaboratively decide which work activities they will complete to meet the hours required by ODHS in their ABAWD Case Plan. OED performs monthly case management and tracks these monthly work activities to ensure the individual completes all work activity hours and meets all work requirements, thereby ensuring their SNAP benefits continue.

(4) A discussion of its capacity and ability to serve at-risk ABAWDs; Information about the size and special needs of its ABAWD population; and

The ABAWD proposal completed by OED is constructed using the projected individuals with an ABAWD status for the federal fiscal year. This information is pulled out of the ONE system. Therefore, all individuals who are subject to the SNAP time limits who must complete the work activities have been accounted for. This means, OED has created a program to offer a qualifying activity for every at-risk ABAWD for every month they are at-risk. Services are leveraged for example, with WIOA title 1, to ensure individualized opportunities are offered to every participant.

- 164,785 SNAP recipients are expected to have an ABAWD status in FFY 2024.
- 102,625 ABAWDs will meet the criteria of an at-risk ABAWD in FFY 2024.

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<sup>28</sup> 7 CFR § 273.7(c)(7)

- (5) Information about the education, training, and workfare components it will offer to meet the ABAWD work requirement.

The following services and activities will be provided through SNAP E&T for individuals in the ABAWD Program:

1. Supervised Job Search
2. Job Search Training
3. Work Activity
4. Internship
5. Internship with Subsidized Employment
6. On-The-Job Training
7. Pre-Apprenticeship
8. Apprenticeship
9. Pre-Apprenticeship with Subsidized Employment
10. Apprenticeship with Subsidized Employment
11. Self-Employment Training
12. Basic Education/Foundational Skills Instruction
13. Career/Technical Education or other Vocational Training; Short-Term Training
14. English Language Acquisition
15. Integrated Education and Training/Bridge Programs
16. Work Readiness Training
17. Workfare
18. SNAP E&T Support Services

Individuals with an ABAWD status may also engage in WIOA services to meet their assigned work activities.

- (c) Optional Workfare<sup>29</sup>: State agencies or other political subdivisions must describe in detail in the plan how the political subdivision, working with the State agency and any other cooperating agencies that may be involved in the program, will fulfill the provisions of 7 C.F.R. §273.7(m). If a State opts to operate an optional workfare program or modify an existing optional workfare program, through a Combined Plan under WIOA, it must provide the following:

- (1) State agencies or political subdivisions submitting a workfare plan must submit with the plan an operating budget covering the period from the initiation of the workfare program's implementation schedule to the close of the Federal fiscal year for each year covered by the Combined Plan. In addition, an estimate of the cost for one full year of operation must be submitted together with the workfare plan for each Federal fiscal year covered by the Combined Plan.

Description of Workfare	A work component in which SNAP recipients who have been determined to have an ABAWD status 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 SNAP benefit allotment. The primary goal of workfare is to improve employability and encourage individuals to move into regular employment. Only individuals with an ABAWD status who reside in non-waived counties or counties not applying Discretionary Exemptions may participate in workfare. The hours a participant may engage in Workfare are determined by ODHS in accordance with the Fair Labor Standards Act.
Target population	People with an ABAWD status: Ages 18 and not yet 51, no dependent children in the SNAP filing group, do not meet any exemptions, live in a non-waived area of the state, and not eligible for Discretionary Exemptions.
Criteria for participation	The individual with an ABAWD status agrees to participate in Workfare as an alternative reduced hour option to 80-hours per month of work-related activities. Each Workfare site has individualized criteria for ABAWDs to participate.
Costs	The cost of implementing and operating Workfare in Oregon include \$178,000.00 for OED to operate Workfare placements within their own agency for individuals with an ABAWD status, and \$100,000.00 to support additional Workfare sites to cover administrative, program, and Worker's Compensation costs.

- (2) If workfare plans are submitted by more than one political subdivision, each representing the same population (such as a city within a county), FNS will determine which political subdivision will have its plan approved. Under no circumstances will a SNAP recipient be subject to more than one SNAP workfare program. If a political subdivision chooses to operate a workfare program and represents a population which is already, at least in part, subject to a SNAP workfare program administered by another political subdivision, it must establish in its workfare plan how SNAP recipients will not be subject to more than one SNAP workfare program.

Oregon recognizes this requirement.

- (d) Voluntary Workfare<sup>30</sup>: State agencies and political subdivisions may operate workfare programs whereby participation by SNAP recipients is voluntary. In such a program, the

penalties for failure to comply, as provided in 7 C.F.R. §273.7(f), will not apply for noncompliance. The amount of hours to be worked will be negotiated between the household and the operating agency, though not to exceed the limits provided under 7 C.F.R. §273.7(m)(5)(ii). In addition, all protections provided under 7 C.F.R. §273.7(m)(6)(i) shall continue to apply. Those State agencies and political subdivisions choosing to operate such a program shall indicate in their workfare plan how their staffing will adapt to anticipated and unanticipated levels of participation for each Federal fiscal year covered by the Combined Plan under WIOA. FNS will not approve plans which do not show that the benefits of the workfare program, in terms of hours worked by participants and reduced SNAP allotments due to successful job attainment, are expected to exceed the costs of such a program. In addition, if FNS finds that an approved voluntary program does not meet this criterion, FNS reserves the right to withdraw approval.

Oregon did not elect to offer voluntary Workfare in addition to Workfare offered in Oregon's SNAP Employment & Training Plan.

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<sup>29</sup> 7 CFR § 273.7(m)

<sup>30</sup> 7 CFR § 273.7(m)(8)

- (e) **Comparable Workfare<sup>31</sup>**: The State agency or political subdivision must provide a description of its program, including a methodology for ensuring compliance with 7 C.F.R. §273.7(m)(9)(ii) for each Federal fiscal year covered by the Combined Plan under WIOA.

Oregon did not elect to offer comparable Workfare in addition to Workfare offered in Oregon's SNAP Employment & Training Plan.

- (f) **Process<sup>32</sup>**: The State agency must submit amendments to the SNAP E&T segment of the Combined Plan for FNS approval at least 30 days prior to the planned implementation in order to receive federal SNAP E&T funding for the activities not covered by the approved Combined Plan.

Oregon recognizes this requirement.

- (g) **Plan Modifications<sup>33</sup>**: If FNS determines that the performance of a State agency with respect to employment and training outcomes is inadequate, FNS may require the State agency to make modifications to the State E&T plan to improve the outcomes.

Oregon recognizes this requirement.

**Funding Disclaimer:** Funds may not be available when SNAP E&T portions of a Combined State Plan under WIOA are approved. FNS's obligation after approving a SNAP E&T plan submitted as part of a Combined State Plan is contingent upon the availability of an appropriation from which payment can be made. Any FNS funding resulting from an approval of a SNAP E&T plan submitted as part of a Combined State Plan is subject to FNS receiving sufficient funds (in the Program Financial Control System for FNS) to fund this and all prior approved SNAP E&T plans submitted as part of a Combined State Plan in their entirety in the time and date order received. Federal reimbursement to States for 50 percent of State administrative expenditures and for participant reimbursements is subject to the above conditions.

<sup>29</sup> 7 U.S.C. 2025(h)(5)(E) as amended by Agricultural Act of 2014 .

<sup>31</sup> 7 CFR § 273.7(m)(9)

<sup>32</sup> 7 CFR § 273.7(c)(8)

<sup>33</sup> 7 CFR § 273.7(c)(8)

## TRADE ADJUSTMENT ASSISTANCE

## **TRADE ADJUSTMENT ASSISTANCE**

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.

# SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM

## 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.)

See Economic and Workforce Analysis section of strategic plan (Workers with Barriers - Older Workers) for detailed discussion.

- (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 10% of Oregon's workforce in 1992, but that figure grew to 24% by 2022. Nearly half (47%) of Oregon SCSEP participants in Program Year (PY) 2022 were age 60-64 at the time of enrollment (Table 1), but 32% were 65 or older, up from 29% in PY 2020.

Table 1

Participant Age at Enrollment	PY 2022 Percent
Age 55-59	22%
Age 60-64	47%
Age 65-69	18%
Age 70-74	9%
Age 75 & Over	5%

There were nearly 70,000 workers ages 55 and over in the health care sector in 2022, and health care and social assistance is one of the industries expected to grow in 2023 and 2024. Manufacturing had 49,000 workers nearing retirement age, retail trade had 48,000, and private and public educational services had 38,000. These industries may present opportunities for older workers as pending retirements encourage employers to seek replacement workers.

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 will continue to develop and maintain relationships with host agencies and other partners in high growth fields to help participants obtain unsubsidized employment.

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 CFR641.325(c))

Workers aged 55 and older make up approximately 24% of Oregon's total workforce. Industries with the highest share of older workers include Agriculture, Forestry, Fishing and Hunting (33%); Mining, Quarrying, and Oil and Gas Extraction (32%); Real Estate and Rental and Leasing (29%); Utilities (28%); Other Services (27%); and Public Administration (27%). The Oregon Employment Department notes that industries with higher-than-average shares of older workers may have difficulty finding enough replacement workers as older workers begin to retire. However, those retirements may also present opportunities for older workers seeking to remain in the workforce if they have relevant work experience. 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 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 results. 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 Centers), 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.

SCSEP is represented in a Memorandum of Understanding (MOU) with each Local Workforce Development Board (LWDB) in the project service area. Several SCSEP offices have staff stationed in the WorkSource Centers, which increases program visibility and streamlines access to SCSEP services. Some WorkSource Centers also serve as SCSEP host agency sites. Staff at WorkSource Centers are 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 subrecipient, Easterseals Oregon, maintains relationships with the local AAAs to coordinate services and make appropriate referrals to one another. SCSEP participants have access to other Older Americans Act (OAA) 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 Vocational Rehabilitation (VR) and Veterans Services to provide additional resources for participants with unique needs. VR provides individualized services that help people with disabilities find and keep a job. Fifty-seven percent of SCSEP participants in Program Year 2022 were individuals with disabilities, and 6% had a severe disability.

The SCSEP subrecipient partners with non-profit organizations 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 self-sufficiency for SCSEP participants while also providing much needed support to community organizations. The SCSEP subrecipient will continue to use these community connections to identify and develop partnerships with organizations that serve older Oregonians.

(D) Planned actions to coordinate SCSEP with other labor market and job training initiatives. (20 CFR 641.302(j))

SCSEP has already joined forces with the LWDBs and WorkSource Centers to share resources and strengthen communication between workforce programs. LWDB meetings provide opportunities for SCSEP project 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 the programs, 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 Centers in their daily operations. In some cases, SCSEP is co-located in the WorkSource Center 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 the SCSEP subrecipient 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, 6 met the SCSEP definition of persistent unemployment when the 2020-2022 tables were released in 2023. Those counties are Crook, Curry, Grant, Jefferson, Klamath, and Lincoln. The Oregon SCSEP will conduct outreach to local economic development offices in these counties. Table 4 shows all Oregon counties, with the 18 urban counties in italics. Easterseals Oregon 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 WorkSource Centers and holds Memorandums of Understanding (MOUs) with Worksystems, Inc., Clackamas Workforce Partnership, and the LWDBs in Salem, Eugene, Medford, and the coastal counties. In 2023, Easterseals also became co-located in several sites around the state and increased their presence in WorkSource Centers, adding MOUs in Gresham, Beaverton, Roseburg, and McMinnville. Being located directly in the WorkSource Centers has made available numerous resources to SCSEP participants and staff. Easterseals requires all participants to enroll in the WorkSource system and work cooperatively with WorkSource staff.

These relationships help the project remain informed of changes in local workforce conditions and allows them to quickly notify participants of potential employment opportunities. SCSEP projects engage with LWDBs to ensure 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 2021 concluded that Oregon's SCSEP served minority individuals in relative proportion to the state's eligible population. During Program Year 2021, 16.7% of the participants in Oregon's SCSEP project were minority

individuals. Census data adjusted for the eligible population show that minorities aged 55 and older make up 19.0% of the state's population.

However, the data indicate that the project did not equitably serve older workers who identify as Asian or Pacific Islander in PY 2021. During the program year, 1.1% of all participants in the Oregon SCSEP project were Asian, compared to the Census rate of 4.4%. No participants in the state SCSEP grant identified as Pacific Islander, compared to 0.5% of the eligible population in Oregon. The number of SCSEP-eligible individuals in these population groups in the counties served by the state SCSEP grant is low, so a small increase in the number of Asian and Pacific Islander older adults being served will significantly improve the project's minority service levels.

To increase representation among these groups, the project is increasing outreach efforts to community organizations that regularly serve older adults in these target populations. Developing and enhancing relationships with service groups that work with minority older adults helps generate 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 SCSEP information in alternate languages and increasing connections with groups who serve multi-lingual populations.

The Oregon SCSEP subrecipient continuously seeks new host agencies that serve minority individuals and provides diversity, equity, inclusion, and accessibility (DEIA) training and implicit bias training to staff. Oregon will monitor minority service levels and adjust outreach strategies as necessary to ensure that the state SCSEP grant equitably serves the state's older worker population.

- (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 October 2023, the Oregon Employment Department reports that 53% of Oregon's 36 counties have unemployment rates (not seasonally adjusted) higher than the state average of 3.3%. Table 2 identifies those counties where Title V services are most needed based on the unemployment rate relative to the rest of the state. Those 19 counties have the greatest need for services that assist unemployed individuals to find work.

Fifty-seven percent of SCSEP participants in PY 2022 reported having a disability. The Oregon SCSEP works with VR to connect participants with comprehensive services to help them succeed in the job market. Also in Program Year 2022, 91% of participants had income at or

below the poverty level and 82% 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 SCSEP will continue to work with groups including the Oregon Employment Department, the Oregon Department of Human Services (ODHS), and other public and private community service programs to identify, recruit, and train eligible older workers.

Table 2

<b>County</b>	<b>October 2023 Unemployment Rate (not seasonally adjusted)</b>
Crook	5.1
Josephine	4.2
Klamath	4.1
Lake	4.1
Douglas	4.0
Columbia	3.9
Coos	3.9
Curry	3.9
<i>Sherman</i>	3.9
Jefferson	3.8
Lane	3.7
<i>Gilliam</i>	3.6
Jackson	3.6
Lincoln	3.6
Linn	3.6
Baker	3.4
Marion	3.4
Polk	3.4
Wasco	3.4
<b>Oregon</b>	<b>3.3</b>
Deschutes	3.3
Grant	3.3
Multnomah	3.3
Union	3.3
Clatsop	3.2
Tillamook	3.2
Umatilla	3.2
Clackamas	3.1
Harney	3.1
Yamhill	3.1
Benton	3.0
Malheur	3.0

Wallowa	3.0
Washington	3.0
Morrow	2.9
Hood River	2.5
Wheeler	2.3

*Local Area Unemployment Statistics (LAUS) Monthly Data Sheet  
Source: Oregon Employment Department QualityInfo.org*

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 two 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))

ODHS 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 become independent, healthy, and safe. 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 Quarter 2 (Q2) Employment target for Oregon’s state SCSEP grant in Program Year 2022 was 29.4% and the actual rate for that period was 17.6% (59.9% of target). For Q4 Employment, the target was 25.1% and actual performance was 13.3% (53.0% 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 (ages 55 and older) who are residents of Oregon. The Oregon state SCSEP grant service area covers 16 counties across the state. Easterseals serves as the national SCSEP grantee in Oregon and serves 19 counties in that capacity.

In PY 2022, 61% of Oregon SCSEP participants were homeless or at risk of becoming homeless, 35% lived in rural locations, and 57% experienced a disability. To address the needs of these populations, Oregon will continue to collaborate with agencies including ODHS Self-Sufficiency Programs and VR 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 3 identifies the number of Program Year 2023 authorized positions in Oregon by county. The only change in authorized position allocations from the prior year was the addition of one position to Multnomah County under the national SCSEP grant project.

Table 3

<b>County</b>	<b>State Grantee</b>	<b>National Grantee</b>	<b>All Grantees</b>
Baker	3	0	3
Benton	0	9	9
Clackamas	0	42	42
Clatsop	0	7	7
Columbia	0	8	8
Coos	0	16	16
Crook	4	0	4
Curry	0	7	7
Deschutes	26	0	26
Douglas	0	24	24
Gilliam	0	0	0
Grant	2	0	2
Harney	2	0	2
Hood River	2	0	2

Jackson	0	41	41
Jefferson	4	0	4
Josephine	0	24	24
Klamath	13	0	13
Lake	2	0	2
Lane	0	64	64
Lincoln	0	13	13
Linn	0	20	20
Malheur	5	0	5
Marion	0	43	43
Morrow	0	1	1
Multnomah	36	81	117
Polk	0	11	11
Sherman	0	0	0
Tillamook	0	6	6
Umatilla	11	0	11
Union	4	0	4
Wallowa	2	0	2
Wasco	4	0	4
Washington	0	45	45
Wheeler	1	0	1
Yamhill	0	12	12
<b>Total</b>	<b>121</b>	<b>474</b>	<b>595</b>

(3) Describe current slot imbalances and proposed steps to correct inequities to achieve equitable distribution.

Of the 301 total modified positions in the state (62) and national (239) SCSEP grants in PY 2023, there were 271 total enrollees in Q1. The imbalance between modified positions and enrollees is -30, or under-enrollment of approximately 10% of total modified positions. Individual counties that experience ongoing slot imbalances are addressed during the annual Equitable Distribution process with all Oregon SCSEP grantees. Strategies to address slot imbalances include enhancing outreach and enrollment efforts in under-enrolled counties and increasing the focus on unsubsidized employment in counties that are over-enrolled.

(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 subrecipient 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.**

Approximately 35% of Oregonians live in rural counties. Employment opportunities and community resources are often more difficult to obtain in rural counties than in metropolitan areas. According to the PY 2022 Quarterly Progress Report (QPR), 28 of the 79 participants served by Oregon's state SCSEP grant during PY 2022 lived in areas identified as rural. Easterseals Oregon publicizes county and regional office locations and self-referral options on the Easterseals Oregon website, as well as through social media channels like Facebook and Instagram.

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. Easterseals offers computer literacy and higher-level computer skills training to SCSEP participants to help improve their employment prospects. Easterseals provides SCSEP participants with electronic copies and hard copies of their Individual Employment Plan (IEP) for easy reference. 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 Veterans Opportunity to Work (VOW) (covered persons who are SCSEP-eligible must receive services instead of or before all 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 under Title I of the Workforce Innovation and Opportunity Act (WIOA);
- Are homeless or are at risk for homelessness; or
- Are formerly incarcerated or on supervision from release from prison or jail within five years of the date of initial eligibility determination.

The priority of service requirements are included in the state SCSEP agreement and are observed by the Oregon SCSEP subrecipient. Local project staff use their connections with other programs, such as VR counselors and Veterans Representatives at WorkSource Centers, 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. Easterseals Oregon works closely with community partners and the local WorkSource Center to identify and provide supportive services to participants. 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 individuals 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 4 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).

Table 4

<b>Poverty Status by County and Age Group</b>					
<b>Area</b>	<b>Total Population for whom Poverty Status is Determined</b>	<b>Population Over 55 with Income at or Below 125% of FPL</b>	<b>Ratio of SCSEP-Eligible Population</b>	<b>Population 55 and Older with Income Below FPL</b>	<b>Population 65 and Over with a Disability, Below Federal Poverty Level</b>
<b>All</b>	<b>4,149,034</b>	<b>175,943</b>	<b>4%</b>	<b>128,558</b>	<b>32,445</b>
Baker	16,220	1,202	7%	940	276
<i>Benton</i>	<i>89,739</i>	<i>2,333</i>	<i>3%</i>	<i>1,713</i>	<i>431</i>
<i>Clackamas</i>	<i>418,012</i>	<i>14,207</i>	<i>3%</i>	<i>10,933</i>	<i>3,285</i>
<i>Clatsop</i>	<i>40,762</i>	<i>2,254</i>	<i>6%</i>	<i>1,299</i>	<i>352</i>
<i>Columbia</i>	<i>52,190</i>	<i>2,040</i>	<i>4%</i>	<i>1,519</i>	<i>312</i>
Coos	63,848	4,448	7%	2,914	733
Crook	24,821	969	4%	794	139
Curry	23,227	1,842	8%	1,353	252
<i>Deschutes</i>	<i>197,716</i>	<i>7,298</i>	<i>4%</i>	<i>5,259</i>	<i>1,211</i>
Douglas	109,996	7,448	7%	5,306	1,228
Gilliam	1,952	195	10%	122	23
Grant	7,059	626	9%	457	182
Harney	7,337	335	5%	261	49
<i>Hood River</i>	<i>23,726</i>	<i>719</i>	<i>3%</i>	<i>489</i>	<i>191</i>
<i>Jackson</i>	<i>219,629</i>	<i>11,732</i>	<i>5%</i>	<i>8,695</i>	<i>2,340</i>
Jefferson	23,526	1,327	6%	978	248
<i>Josephine</i>	<i>86,776</i>	<i>6,659</i>	<i>8%</i>	<i>4,619</i>	<i>852</i>
Klamath	68,416	4,684	7%	3,427	773
Lake	7,690	690	9%	560	286
<i>Lane</i>	<i>373,861</i>	<i>18,190</i>	<i>5%</i>	<i>13,668</i>	<i>3,318</i>
<i>Lincoln</i>	<i>49,706</i>	<i>3,693</i>	<i>7%</i>	<i>2,674</i>	<i>577</i>
<i>Linn</i>	<i>126,135</i>	<i>5,577</i>	<i>4%</i>	<i>4,132</i>	<i>976</i>
Malheur	27,920	1,575	6%	1,131	346
<i>Marion</i>	<i>336,003</i>	<i>12,860</i>	<i>4%</i>	<i>9,283</i>	<i>2,228</i>
Morrow	12,095	444	4%	276	52
<i>Multnomah</i>	<i>793,847</i>	<i>30,797</i>	<i>4%</i>	<i>22,789</i>	<i>5,705</i>
<i>Polk</i>	<i>85,522</i>	<i>3,807</i>	<i>4%</i>	<i>3,005</i>	<i>808</i>
Sherman	1,898	171	9%	123	26

<i>Tillamook</i>	26,558	1,715	6%	1,404	249
Umatilla	75,794	3,238	4%	1,953	557
Union	25,752	1,329	5%	955	263
Wallowa	7,351	447	6%	274	78
Wasco	26,082	1,481	6%	951	228
<i>Washington</i>	594,027	15,370	3%	11,185	3,086
Wheeler	1,389	172	12%	88	27
<i>Yamhill</i>	102,452	4,069	4%	3,029	758

<i>Urban</i>	3,642,743	144,801	4%	106,646	26,907
Rural	506,291	31,142	6%	21,912	5,538
<b>Total</b>	<b>4,149,034</b>	<b>175,943</b>	<b>4%</b>	<b>128,558</b>	<b>32,445</b>

Source: U.S. Census Bureau, American Community Survey, 2018-2022 5-year estimates, Tables B17024 and 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 PY 2022 lived in urban areas, while 35% resided in rural Oregon. Urban counties are shown in italics in Table 4.

- (B) Have the greatest economic need

See Table 4.

- (C) Are minorities

**Table 5**  
**Population 55+ Below the Federal Poverty Level (FPL) by Race**

Race	Total Population for whom Poverty Status is Determined	Population 55 and Over Below FPL
<b>All</b>	<b>4,149,034</b>	<b>128,558</b>
White	3,268,836	109,066
Black	75,943	2,495
American Indian and Alaska Native	45,007	1,746

Asian	184,625	5,259
Native Hawaiian and Other Pacific Islander	16,753	512
Some Other Race	177,878	2,806
Two or More Races	379,992	6,674
White Alone, Not Hispanic or Latino	3,045,628	106,545
Hispanic or Latino	571,809	6,799

Source: U.S. Census Bureau, American Community Survey, 2018-2022 5-year estimates, Tables B17001A through B17001I  
 These estimates are subject to a margin of error, and margins of error can be large for small populations and less populated counties.

(D) Are limited English proficient.

Table 6

Poverty Status by Language Spoken		
Language Group	Population Below Federal Poverty Level	Population at or Above Federal Poverty Level
Speak only English	379,288	2,957,008
Speak Spanish	50,021	299,515
Speak other Indo-European languages	11,250	89,621
Speak Asian and Pacific Island languages	16,312	108,068
Speak other languages	6,670	21,166
<b>All Languages</b>	<b>463,541</b>	<b>3,475,378</b>

Source: U.S. Census Bureau, American Community Survey, 2018-2022 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 4.

(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 Department of Labor (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.

# COMMUNITY SERVICES BLOCK GRANT

## **A. COMMUNITY SERVICES BLOCK GRANT**

(OMB Control Number: 0970-0382)

Note: Below is information about the employment and training activities carried out under the Community Services Block Grant (CSBG) (42 U.S.C. 9901 et seq.) that is included in the WIOA Combined State Plan. The complete CSBG State Plan is submitted directly to the Federal agency that administers that program and is collected under OMB Control Number: 0970-0382.

Where CSBG is included in the Combined State Plan, the State CSBG Lead Agency (as designated by the chief executive of the State under the requirements of section 676(a) of the CSBG Act (42 U.S.C. 9908(a)) will coordinate plans for employment and training activities under CSBG as part of a larger antipoverty and workforce development strategy.

### **WIOA Combined State Plan – Community Services Block Grant (CSBG)**

The Community Services Block Grant (CSBG) is a federally funded block grant in the Office of Community Services, Administration for Children and Families, United States Department of Health and Human Services that provides funds to states, territories and tribes to administer to support services that alleviate the causes and conditions of poverty in under resourced communities. The Oregon Housing and Community Services (OHCS) oversees the eligible entities or Community Action Agencies (CAA) in these efforts. The eligible entities coordinate the provision of employment and training activities through statewide and local WIOA workforce development systems and is included in CSBG activities. Community Action Agencies submit a Community Action Plan or Implementation Report to the state. This document describes the agencies coordination efforts with other organizations including WIOA where applicable.

The CSBG program, administered by OHCS, awards funds to local CAAs to provide services to low-income households at or below 125% of the federal poverty level (FPL). CSBG grantees determine how funding will be used to support allowable CSBG activities, such as employment and training activities.

The Community Action Agencies (CAA) are required in the CSBG Act to complete a community needs assessment every 3 years. Community Needs Assessments are an integral part of a CAA's planning and are to be used to set the direction for their work. Section 676(b)(11), of the CSBG Act states "...an assurance that the State will secure from each eligible entity in the State...a community action plan...that includes a community needs assessment for the community served, which may be coordinated with community needs assessments conducted for other programs..." A community needs assessment establishes a profile of a community, noting both needs as well as community resources. CAA's conduct assessments to determine the needs in a community that can be addressed and the population that is most impacted by the need. From this identification of needs on both the family and community level, and through a strategic process that also includes consideration of agency needs, CAAs determine the

outcomes that they plan to achieve. While some CAAs may have a focus on CSBG supported services (or other program services such as Head Start, Workforce, HUD, ODHS programs,) when they do the assessment, the data considered during the process should be sufficient to inform agency-wide strategic choices. A portion of this assessment analyzes the employment opportunities/challenges. Not only should an assessment include the identification of needs, but also the resources that are currently available or being developed in a community. Through the identification of resources, a CAA can ascertain where there are gaps in services and build linkages and partnerships throughout the community.

As part of the Combined State Plan, the State CSBG Lead Agency must:

- (a) Describe how the State and the eligible entities will coordinate the provision of employment and training activities through Statewide and local WIOA workforce development systems; and may

When a CAA elects to use CSBG funding to provide workforce development, employment and training services to households, those services will be required to align with the State's WIOA strategies and be coordinated with the local partners. The inclusion of the CSBG program in Oregon's Workforce Plan opens new opportunities for CAAs to be integrated into local workforce services delivery system. The State CSBG Office will identify and evaluate methods of using CSBG funds to coordinate service delivery of training and employment activities across programs. The CSBG State Grant Administrator is responsible for being an active liaison between the State WIOA combined state plan, the State Association, and the 18 Community Action Agencies. CAAs are encouraged (through contract and monitoring) to coordinate with and refer to their local Workforce Services Job Centers.

Community Action Agencies align services to ensure that customers receive the best available employment and training resources, as well as employment supports, to achieve their employment and self-sufficiency goals. As partners in the workforce services, these services target vulnerable populations and other least job ready customers by focusing on reduction of barriers to employment. Oregon Housing and Community Services (OHCS) is the department designated by the State of Oregon to work with other agencies to establish partnerships and opportunities for partnerships.

- (b) Provide examples of innovative employment and training programs and activities conducted by eligible entities or other neighborhood-based organizations as part of a community antipoverty strategy.

CSBG funds support activities in Education, Employment, Housing, Income, Infrastructure and Asset building, Health and Social/Behavioral Development (including nutrition), Civic

Engagement and Community Involvement, Supporting services in multiple domains, emergency management and community linkages by the community action agencies.

CSBG funds are flexible in allowances and may be used to provide support to a client (youth or adult) set goals in gaining work skills and/or income. OHCS will utilize the WIOA state plan to align and integrate the local programs into the workforce and education systems to strengthen our communities. CAAs must submit a Community Action Plan to the state. This document describes the agencies coordination efforts with other organizations including WIOA.

Services to individuals and families that are WIOA related include: -Customer/client evaluations and assessments; -Information and referral based on client needs for education, employment or other assistance services (some services and assistance provided in house), enrollment in career coaching programs; Job readiness and skills counseling, referrals to Vocational training; Limited skill development, computers, day care and others (not all agencies); Job placement and development with local employers; -Employability skills orientation and classes; Limited on-the-job training (not all agencies); Programs for youth and family development; Day Care and Head Start services (not all agencies); After school and summer programs for youth (not all agencies); Transportation (not all agencies); Emergency and special needs; Employment supplies and post-employment supports; and Client/customer case management, follow-up and tracking.