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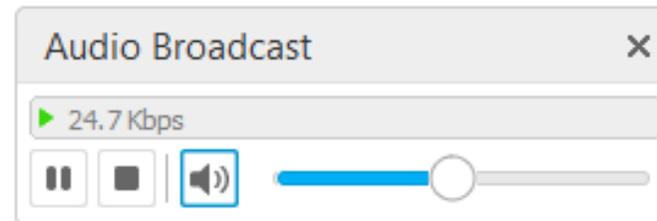


WIOA State Plan Modifications from a Disability Perspective: Recommendations for Ensuring Inclusion and Equal Opportunity in State Plan Updates

January 21, 2018

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The National Center on Leadership for the Employment and Economic Advancement of People with Disabilities (LEAD) is a collaborative of disability, workforce and economic empowerment organizations led by **National Disability Institute** with funding from the **U.S. Department of Labor's Office of Disability Employment Policy**, Grant No. #OD-23863-12-75-4-11.

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LEAD CENTER MISSION

To advance sustainable individual and systems level change that results in improved, competitive integrated employment and economic self-sufficiency outcomes for individuals across the spectrum of disability.

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WELCOME

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TODAY'S MODERATOR

Michael Morris

Policy Team Leader, LEAD Center

Executive Director, National Disability Institute



TODAY'S SPEAKERS

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SPEAKERS CONTINUED

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AGENDA

- ▶ Welcome by the Office of Disability Employment Policy
- ▶ Overview of requirements from the Employment and Training Administration
- ▶ Panel of Workforce Board and Vocational Rehabilitation Partners, including information on available technical assistance
- ▶ Information on Promising Practices
- ▶ Discussion Questions and Recommendations
- ▶ Q&A



WEBINAR OBJECTIVES

- ▶ Review the Two-Year Modification Requirements for Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plans, due March 15, 2018
- ▶ Discuss expectations from a disability perspective and highlight promising practices from a number of states' Unified or Combined State Plans
- ▶ Review the practices in South Carolina that support promising practices so that youth and adults with disabilities benefit from services that are leveraged from the workforce system and its partners, including vocational rehabilitation
- ▶ Discuss technical assistance that is available through a variety of sources, and promising practices from other states



REQUIREMENT TO REVIEW AND MODIFY WIOA STATE PLANS

- ▶ Department of Labor's (DOL's) Employment and Training Administration (ETA) issued guidance to State Workforce Agencies, State and Local Workforce Boards and other partners ([TEGL 6-17](#)) on January 24, 2018 on reviewing and modifying state plans, as required by WIOA.
- ▶ The Department of Education's (ED's) Rehabilitation Services Administration issued complementary guidance to State Vocational Rehabilitation Agencies ([RSA-TAC-18-01](#)).
- ▶ WIOA requires that States review their plans every two years and update their plans based on changes in the labor market, economic conditions or other factors affecting implementation.

(See LEAD Center Brief on [“Reviewing and Updating Your WIOA Unified or Combined State Plan from a Disability Perspective”](#))

OVERVIEW OF REQUIREMENTS FOR REVIEWING AND MODIFYING WIOA STATE PLANS

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Unit Chief

WIOA Governance

Employment and Training
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U.S. Department of Labor

Robert Kight, Ed.D.

Director, Adult Services and
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The WIOA State Plan is both a *compliance document* and a *living document*.

- Ensures that statutory regulatory requirements are met
- Serves as a roadmap which reflects and accommodates adjustments and refinements to the State's continuous improvement efforts in delivering services

Memory Lane: Overview of State Plan Design

- I. Identification of WIOA State Plan Type
- II. Strategic Elements
- III. Operational Planning Elements
- IV. Coordination with Combined State Plan Programs
- V. Common Assurances
- VI. Program-Specific State Plan Requirements
- VII. Program-Specific Requirements for Combined State Plan Partner Programs

Two-Year Modification Requirements: Source Documents

- WIOA requires that States review their plans every two years and update State Plan strategies based on changes in the labor market and economic conditions or other factors affecting the continued implementation of the State Plan
- Departments published joint guidance January 24, 2018
- Information Collection Request (ICR) non-material change was approved by OMB December 18, 2017 (No. 1205-0522)

Two-Year Modification Requirements: Process

- Submission deadline: March 15, 2018
- States must submit their modifications via the online portal hosted by ED's RSA (separate training available)
- Stakeholder collaboration and public comment are required prior to submission of the modified State Plan

Two-Year Modification Requirements: Content

The Departments expect States to update plans to reflect implementation of WIOA and to improve areas of the plan impacted by the publication of jointly-administered regulations and guidance, or changes in circumstances in the State, since the initial State Plan submission.

At minimum States must:

- Review the initial WIOA State Plan and make updates where warranted for strategy and operations adjustments due to changing economic or other factors in the State
- Review and update applicable assurances for continued compliance
- Update performance accountability targets in accordance with forthcoming guidance
- Update plan narratives, if appropriate, where ICR adjustments have occurred

Two-Year Modification Requirements: Content

Title I ICR updates:

- Clarified required information for single-area states to “submit any information required in the local plan”
- Refined language regarding requirements for the Youth program to more clearly identify expectations

Title II ICR updates:

- Clarified that States are required to submit information to address section 427 of the General Education Provisions Act.
- Added an assurance regarding the statutory requirement in section 502 of WIOA concerning the Buy America Act.

Federal Review and Approval

- Federal review occurs during the 90-day period after State Plan submission
- Departments will issue decision notifications within 90-days of the State Plan submission
- Plan modifications will be posted on the Department of Education's website for public access
<https://www2.ed.gov/about/offices/list/osers/rsa/wioa/state-plans/index.html>

Considerations for Plan Modification: External Drivers

- Changes in economic conditions
- Changes in the environmental conditions
- Governor and State legislative actions affecting education and workforce development

Considerations for Plan Modification: Programmatic Drivers

- Identified opportunities to expand program integration and alignment since initial years of implementation
- Guidance issued for specific programs that might have impacted State policies and practices for program delivery since the initial State Plan
- Changes in the identification of regions and local workforce development area geographies
- Formal evaluations and monitoring that have impacted both the delivery and measurement of services since the approval of the original State Plan
- Continuous improvement outcomes and customer-centered design results



Resources:

- Required Elements for the Two Year Modification

https://www.doleta.gov/wioa/state_plan_resources.cfm

- Joint State Plan guidance

https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=5822

<https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/octae-program-memo-18-1.pdf>

<https://www2.ed.gov/policy/speced/guid/rsa/subregulatory/tac-18-01.pdf>

- All TEGs classified as “WIOA Operational Guidance”

<https://wdr.doleta.gov/directives/>

- WIOA Resource Webpage

www.doleta.gov/wioa

- WIOA Specific Performance and Reporting Guidance

<https://www.doleta.gov/performance/>

- WorkforceGPS Resources

www.workforcegps.org/resources

- Innovation and Opportunity Network (ION)
Quickly find all of the latest WIOA Implementation Training Resources in 11 focus areas

<https://ion.workforcegps.org/FocusAreas>

- Content from the April – May 2017 WIOA National Convenings

https://ion.workforcegps.org/resources/2017/02/07/09/31/2017_WIOA_National_Convening

COLLABORATIVE PLANNING BETWEEN SOUTH CAROLINA'S WORKFORCE BOARD AND VOCATIONAL REHABILITATION PROGRAMS TO PROMOTE EQUAL OPPORTUNITY AND EMPLOYMENT OUTCOMES



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PROMISING PRACTICES IN WIOA STATE PLANS: THINGS TO CONSIDER TO PROMOTE EQUAL OPPORTUNITY

WITH A FOCUS ON ALIGNMENT AND INTEGRATION, PLANNING ACROSS PROGRAMS, AND LEVERAGING RESOURCE ACROSS SYSTEMS



DATA AND RESOURCES TO INSPIRE A VISION OF EMPLOYMENT (DRIVE) WEBSITE RESOURCES

Andy Arias

Policy Advisor

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U.S. Department of Labor



DRIVE WEBSITE at <http://drivedisabilityemployment.org/>



Hover over a state to view snapshot statistics. Click on a state to view that state's full profile, including all data points, vocational rehabilitation profile, and all related state initiatives.

Featured Resources

- ▶ Model Cooperative Agreements Between VR Agency and Medicaid, Mental Health, and Intellectual and Developmental Disabilities Agencies - 11/20/2017
- ▶ ODEP's Pilot Provider Transformation Manual – 2017 Webinar Series Overview - 11/15/2017
- ▶ Most Integrated Employment Setting - State Self-Assessment - 10/23/2017
- ▶ Vision Quest Replication Manual - 09/15/2017
- ▶ E1st State Transformation Guide - 06/16/2017

[View All Featured Resources](#)

National Snapshot

2015 National Population.	321,418,821	0.8% Change from 2014 to 2015
2015 Number of people with disabilities (all disabilities, ages 18-64).	21,411,549	4.44% Change from 2014 to 2015
2015 Number of people with disabilities who are employed (all disabilities, ages 18-64).	7,117,518	1.23% Change from 2014 to 2015
2015 Percentage of working age people who are employed (all disabilities).	34.87%	1.46% Change from 2014 to 2015
2015 Percentage of working age people who are employed (NO disabilities).	76.04%	0.89% Change from 2014 to 2015
2016 National Labor Force Participation Rate (all disabilities).	31.20%	2.24% Change from 2015 to 2016
2016 National Labor Force Participation Rate (NO disabilities).	76.40%	0.39% Change from 2015 to 2016



Home > South Carolina

South Carolina

Select a State

- Snapshot
- State Data
- WIOA Profile**
- Policies and Initiatives

WIOA PROFILE

[View Full WIOA State Plan](#)

[Download WIOA Profile \(PDF\)](#)

The material cited below is taken directly from each state's plan for WIOA implementation. These sections of the state plan were selected because of their relevance to youth and adults with disabilities. However, all programs and services under WIOA must be physically and programmatically accessible to individuals with disabilities.

- Employment First State Leadership Mentor Program (EFSLMP)
- Customized Employment
- Braiding/Blending Resources
- Section 188/Section 188 Guide
- DEI/Disability Resource Coordinators
- Other State Programs/Pilots that Support Competitive Integrated Employment
- Financial Literacy /Economic Advancement
- Benefits
- School to Work Transition
- Data Collection
- Small business/Entrepreneurship
- Career Pathways
- Employment Networks

OVERVIEW OF PROMISING PRACTICES IN REVIEWING AND MODIFYING YOUR STATE PLAN

Michael Morris

Policy Team Leader, LEAD Center

Executive Director, National Disability Institute



AREAS TO CONSIDER IN MODIFYING YOUR STATE PLAN

- ▶ Employment First partnerships and activities (e.g., Employment First State Leadership Mentoring Program (EFSLMP))
- ▶ Disability Employment Initiative activities and practices from DEI states that can be replicated
- ▶ Strategic Plan to promote Employment First
- ▶ Creation of an Executive Order on Disability Employment
- ▶ Creation of events that focus on disability recruitment, hiring and retention, transitioning youth-focused events



MORE AREAS TO CONSIDER

- ▶ Alternative training models and options (e.g., OJT, work-based learning/training, apprenticeships, internships, temporary work experiences, supported employment, etc.)
- ▶ Customized Employment in the workforce system and through partners, including Vocational Rehabilitation, Developmental Disabilities and Community Rehabilitation Providers
- ▶ Introduction of alternative assessments to support Customized Employment (e.g., Discovery, Guided Group Discovery, Self-Guided Discovery, etc.) directly or with partners



EVEN MORE AREAS TO CONSIDER

- ▶ Partnerships with Behavioral Health agencies and community rehabilitation programs that implement Individual Placement and Support (IPS) programs
- ▶ Fully implement a coordinated Business Relations program across core programs that includes leveraging community partnerships
- ▶ Develop and disseminate educational materials about career pathways and other opportunities to promote employment for youth and adults with disabilities

OTHER IDEAS TO CONSIDER

- ▶ Develop toolkits, education program and other resources for people with disabilities and workforce professionals
- ▶ Create integrated programs for youth with disabilities in transition, including Career and Technical Education, curricula that provide foundation skills for transition to employment, postsecondary education and training designed for people who face barriers to employment
- ▶ Youth services to include financial literacy, entrepreneurship, and work experiences leading to financial self-sufficiency



MORE IDEAS TO CONSIDER

Establishing programs with schools to offer instruction in financial literacy for all students, including children and youth with disabilities (K-12)

Provide accessible information on Labor Market Information for workforce professionals and people with disabilities, with employment information on in-demand industry sectors, occupations and career pathways



DISCUSSION WITH SPEAKERS AND PANELISTS



PANEL QUESTION #1

One major purpose of WIOA is to “increase access and opportunities for the employment, training, and support services that individuals, particularly those with barriers to employment, need to succeed in the labor market.” How can the state plan assist in moving a state forward in increasing physical and programmatic accessibility?



PANEL QUESTION #2

How can people with disabilities, programs, providers, and advocates for people with disabilities be engaged in planning discussions and get involved in the state planning process?



PANEL QUESTION #3

What are three things a state can do to engage the disability community in all facets of the unified plan development?



PANEL QUESTION #4

To increase access and opportunities for job seekers with disabilities implies a state has baseline information on current access and opportunities. What data and information would best provide this baseline information for state plan development?



PANEL QUESTION #5

All comprehensive AJCs must be physically and programmatically accessible to individuals with disabilities. The state WDB must establish objective criteria and procedures for Local Boards to use to certify the AJC. The criteria must include “effectiveness in ensuring equal opportunity for individuals with disabilities to benefit from One-Stop services.” What can you share with us about how you approach measurement and documentation of this requirement?



PANEL QUESTION #6

Program coordination standards might include use of integrated resource teams (IRT) as used in the Disability Employment Initiative (DEI) to blend and braid resources, which jointly fund services to meet the specific needs of individuals with disabilities. Who might be engaged in a team like an IRT? What systems and funders might be involved? How could this be described in the Combined/Unified State Plan?



PANEL QUESTION #7

How might state and local WDBs focus on equal opportunity, including the effective participation in the workforce development system of individuals with disabilities? How could this be described in the Combined/Unified State Plan?



PANEL QUESTION #8

What technical assistance and resources are available to assist states in modifying their state plans from a disability perspective?



PANEL QUESTION #9

WIOA seeks to deliver a customer/human-centered system and excellent customer service. What are critical elements of such a system for individuals with disabilities? Are these elements different from other customers of the system?



PANEL QUESTION #10

WIOA considers operational and strategic planning elements. What are the differences as they relate to people with disabilities?



PANEL QUESTION #11

Is there something you would like to highlight as an “aha moment” from your collaborative planning, or something else that you are particularly proud of?



PANEL QUESTION #12

Does the State Plan's workforce analysis of the current labor market trends include identifying skill gaps by individuals with barriers to employment, including individuals with disabilities?



HARNESSING THE POWER OF COLLABORATION: COMMON AGENDA

- ▶ Recommendation 1: State and Local Workforce Boards should proactively outreach to people with disabilities and their families, providers of long term services and supports, and disability nonprofit organizations to identify needs and challenges to effective participation in career and training services funded by AJCs
 - ▶ Approach:
 - ▶ Public Forums
 - ▶ Focus Group Meetings
 - ▶ Formal Request for Comments

HARNESSING THE POWER OF COLLABORATION: COMMON AGENDA

- ▶ Recommendation 2: Identify cross-system service delivery efforts to increase competitive integrated employment for youth and adults with disabilities.
 - ▶ Approach:
 - ▶ Integrated Resource Teams
 - ▶ Braiding and Blending of funds
 - ▶ Data Sharing Agreements

HARNESSING THE POWER OF COLLABORATION: SHARED MEASUREMENT SYSTEMS

- ▶ Recommendation 3: Describe customer flow with a map of services and touch points across systems for common customers who may benefit from multiple systems.
 - ▶ Approach:
 - ▶ Ask for customer feedback on quality improvements needed for coordinated service delivery
 - ▶ Review and reach agreement on Common Performance Goals among systems
 - ▶ Disaggregate data that reports on access to career and training services, skills certification, and employment outcomes.



HARNESSING THE POWER OF COLLABORATION: SHARED MEASUREMENT SYSTEMS

- ▶ Recommendation 4: Describe the metrics the state will use to measure the strength and effectiveness of collaboration and how they will collect the data necessary to monitor the collaboration
 - ▶ Approach:
 - ▶ Increase the number of IPEs developed jointly by VR and Workforce Investment System
 - ▶ Increase the percent of customers who benefit from braided or blended funding
 - ▶ Increase the number of formal agreements that detail collaborative processes among service delivery systems.

HARNESSING THE POWER OF COLLABORATION: MUTUALLY REINFORCING ACTIVITIES

- ▶ Recommendation 5: Document and describe the approach the state is taking to coordinate services with other disability service delivery systems.
 - ▶ Approach:
 - ▶ MOUs that describe how resources will be braided/blended
 - ▶ Eligibility/Enrollment process will be coordinated
 - ▶ Personnel and Providers will be cross trained
 - ▶ Data Outcomes will be tracked and shared



HARNESSING THE POWER OF COLLABORATION: MUTUALLY REINFORCING ACTIVITIES

- ▶ Recommendation 6: Identify state laws, regulations and policies that impede successful achievement of Workforce Development goals and include strategies to change and/or modify them.
 - ▶ Approach:
 - ▶ Seek public input on challenges faced by people with disabilities to access services and supports they need with resources integrated across systems
 - ▶ Identify policy and program changes that will encourage braiding and blending of public funding to advance employment and economic self-sufficiency.

HARNESSING THE POWER OF COLLABORATION: CONTINUOUS COMMUNICATION

- ▶ Recommendation 7: Establish a standing workgroup of the state and local Workforce Development Boards to identify barriers and facilitators to collective impact that benefits the employment and economic advancement of youth and adults with disabilities
 - ▶ Approach:
 - ▶ Engage CILs and other disability groups to present on challenges and opportunities
 - ▶ Produce regular reports to the WDBs on documenting progress to collective goals

HARNESSING THE POWER OF COLLABORATION: BACKBONE SUPPORT

- ▶ Recommendation 8: Dedicate time at each WIB meeting at a state and local level to review current status of core indicators of collective impact regarding employment and economic advancement outcomes for youth and adults with disabilities:
 - ▶ Shared Measurement systems
 - ▶ Mutually Reinforcing Activities
 - ▶ Common Agenda
 - ▶ Continuous Communication
- ▶ Approach:
 - ▶ Data Analysis Reports
 - ▶ Invite other disability related systems to present at WIB meetings on a regular basis
 - ▶ Document success with individual personal stories and presentations



RESOURCES

- ▶ LEAD Center Brief on Reviewing and Updating Your WIOA Unified or Combined State Plan from a Disability Perspective
<http://leadcenter.org/resources/report-brief/policy-brief-reviewing-and-updating-your-wioa-unified-or-combined-state-plan-disability-perspective>
- ▶ LEAD Center Resources on WIOA From a Disability Perspective
<http://leadcenter.org/wioa-workforce-development>
- ▶ USDOL WIOA Website
<http://www.doleta.gov/wioa/>
- ▶ USDOL Advisory Committee on Increasing Competitive Integrated Employment for Individuals with Disabilities
<http://www.dol.gov/odep/topics/WIOA.htm>
- ▶ Workforce GPS Disability and Employment Community
<https://disability.workforcegps.org/>



WIOA State Plan Modifications From A Disability Perspective: Recommendations For Ensuring Inclusion And Equal Opportunity In State Plan Updates

QUESTION & ANSWER



UPCOMING WEBINARS

▶ Webinar Series

- ▶ **Title:** AJC Certification & Section 188: A Window of Opportunity to Impact Equal Opportunity Policy & Practice for Individuals with Disabilities
 - ▶ 1st Webinar: Wednesday, March 7, 2018 at 3:00 -4:00 pm (EST)
 - WIOA from a Disability Perspective & Section 188: A Powerful Foundation for Access
 - ▶ 2nd Webinar: Wednesday, March 21 at 3:00-4:30 pm (EST)
 - State Workforce Systems that are Making Equal Opportunity a Priority: Missouri, Virginia, California
 - ▶ 3rd Webinar: April 4, 2018 from 3:00-4:30 pm (EST)
 - Achieving 188 Compliance & AJC Certification: Key Strategies & Actions from Policy to Procedures



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