# Rhode Island PYs 2024-2027

### Program-Specific Requirements for State Vocational Rehabilitation (Combined or General)

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.

##### 1. 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*

(B) has established a State Rehabilitation Council

##### 2. In accordance with Assurance (a)(1)(B), if selected, 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.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open [this link to the blank table](file:///C:\node\578511). You can copy and paste the table into the narrative field, and start over if needed.

| Council Representative | Current Term Number/Vacant | Beginning Date of Term Mo./Yr. |
| --- | --- | --- |
| Statewide Independent Living Council (SILC) | Vacant |  |
| Parent Training and Information Center | 1st term | 11/2023 |
| Client Assistance Program | N/A | 11/2023 |
| Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency) | 2nd term | 11/2023 |
| Community Rehabilitation Program Service Provider | 2nd term | 11/2022 |
| Business, Industry, and Labor | Vacant |  |
| Business, Industry, and Labor | Vacant |  |
| Business, Industry, and Labor | Vacant |  |
| Business, Industry, and Labor | Vacant |  |
| Disability Advocacy Groups | 1st term | 9/2021 |
| Current or Former Applicants for, or Recipients of, VR services | 1st term | 9/2022 |
| Section 121 Project Directors in the State (as applicable) | N/A | 9/2019 |
| State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA) | Vacant until Dept of Ed fills position |  |
| State Workforce Development Board | Vacant |  |
| VR Agency Director (Ex Officio) | 1st term | 5/2022 |
|  |  |  |

##### 3. 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.

ORS and SRC consistently meet quarterly throughout the year, which includes  quarterly executive board meetings, quarterly full council meetings, an annual planning day, and other meetings regarding best practices in vocational rehabilitation that are not annually scheduled. ORS works in conjunction with the SRC to promote individuals to take an interest in joining the SRC. These individuals can come from a number of areas including employers, parents of individuals with disabilities, educators, students in vocational rehabilitation programs, customers/past customers of our vocational rehabilitation program, etc.

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.

**Goals of the Council**

The Workforce Innovation and Opportunities Act charges the State Rehabilitation Council with meeting the following goals:

• Review, analyze, and advise ORS regarding the performance of their responsibilities in planning, developing, and implementing services to persons with disabilities to affect competitive employment outcomes,

• Advise and assist in the application of the State Plan, strategic plans, reports, needs assessments, and evaluations required under the Rehabilitation Act of 1973, as amended,

• Conduct a review and analysis of the effectiveness of consumer satisfaction with the functions and activities of the State Agency as they relate to competitive, integrated employment outcomes,

• Advise the State Agency and provide for working relationships between the State Agency and the Statewide Independent Living Council (SILC),

• Perform such other functions as the Council deems appropriate and that are comparable to the other functions performed by the Council, and

• Prepare and submit an Annual Report to the Governor and the Rehabilitation Services Administration (RSA).

In 2023, members of the Council assisted ORS with reviewing ORS State Plan updates. The State Plan, Policy, and Quality Assurance Committee of the State Rehabilitation Council (SRC) leads the SRC to provide meaningful comments and feedback to ORS. The committee leads the review of the quality of ORS service delivery to ORS customers by engaging in commentary on plans and policies, the Comprehensive Needs Assessment (CNA), and the vocational rehabilitation portion of the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan. During the last few years, the committee’s focus was working with ORS to produce a monthly survey of consumers. This data is used as part of ORS’s CNA and was incorporated into the State Plan update. In the later part of this year, the SRC received the ORS State Plan updates.  The SRC initially began to plan the work. This process resulted in engaging more Council members to participate in the work of the State Plan to capture diverse voices that could bring different perspectives and provide meaningful feedback to ORS. The initial stages of planning consisted of receipt of the updates to the state plan from ORS. The SRC then requested that ORS meet with the members of our Council on a weekly basis for a total of five weeks to explain the changes in each section. ORS did meet with the SRC and provided a helpful framework and highlighted important issues. The Council found this to be immensely helpful and the work continued through the process until the SRC submitted final comments to ORS.

Over the past year, the Council has collaborated with the Governor’s Commission on Disabilities (GCD), and other state organizations representing all Rhode Islanders, to get the telecommunications participation for voting members reinstated, but the issue has stalled in the State Legislature.

Given the nature of this Council, and the number of people who either have a disability that makes them susceptible or have a vulnerable disabled child of family member at home, it is not surprising that concerns around COVID have diminished its in-person numbers. The SRC is currently working on new recruitment ideas and will seek help from the National Coalition of State Rehabilitation Councils, as well as the Office of Rehabilitation Services to assist us with this. The SRC welcomes help from ORS with recruitment of new membership.

As part of efforts towards recruitment for SRC new membership, ORS will collaborate with the SRC on building joint strategies for recruiting new members, such as:

* Collaborating with community organizations such as Independent Living Center (ILC) to identify potential SRC candidates.
* Partnering with ORS to create and launch a targeted advertisement campaign encouraging VRC’s to identify potential SRC candidates.
* Planning and holding SRC recruitment events to identify potential SRC candidates.
* Increasing availability and accessibility of SRC materials online and developing a robust communication, marketing, and branding strategy for SRC.
* Developing print and social media recruitment strategies with the committee.  In addition to eliciting suggestions to the committee for any additional recommendations for the most effective print and electronic media materials to reach potential committee members.
* Ensuring that as a council vacancy opens, the SRC chair(s) will recruit, recommend, and consult with the Governor’s Office to ensure membership compliance with the Rehabilitation Act.
* Working with the SRC to actively recruit and outreach with business and disability organizations to educate them on the services of ORS and the purpose of SRC.
* And continually reviewing and updating the SRC portion of the ORS website and explore including an informational video to be developed in conjunction with the SRC.

ORS will assist SRC with developing and disseminating a recruitment flyer, ORS and SRC will educate VR staff to the mission and purpose of the SRC to enable them to assist with recruiting, and

ORS will also explore recruitment possibilities for SRC membership via various Workforce Development Boards and Sub Committees.

##### 4. 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.

On behalf of the State Rehabilitation Council, we appreciate this opportunity to provide the following comments and recommendations regarding rehabilitation services (VR) portion of the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan for 2023 select Office of Rehabilitation Services (ORS).

The SRC’s comments related to the Combined State Plan are the culmination of input from a variety of constituencies, including acknowledgment of the comments from Disability Rights Rhode Island and individual members of the State Rehabilitation Council.

The comments provided relate to areas in need of clarification or suggest changes to the language of the State Plan. Sections of the plan that did not warrant comment are not addressed in this letter.

(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): [check box] (A) is an independent State commission.*

*(B) has established a State Rehabilitation Council.*

In Rhode Island’s response to the COVID-19 pandemic, Executive Order 21-72 enabled public bodies covered by the Open Meetings Act to meet virtually. This was an enormous advantage for all attendees, but particularly for vulnerable individuals with disabilities. Once Executive Order 21-72 expired, these groups now meet in person. The SRC is concerned that not allowing virtual meetings has had the effect of discouraging individuals with disabilities from serving on the Council and attending meetings, thereby limiting the voices of these individuals in government on significant matters that affect their wellbeing and everyday lives.

Before COVID, and during the pandemic when Executive Order 21-72 was in place, the Council had an abundant membership, meeting all required membership areas except for two vacancies in Business, Industry, and Labor. The SRC had good recruitment and participation, in part due to the use of telecommunications (i.e., platforms like Zoom) for its meetings. Once the more severe danger of the pandemic passed, the State removed the ability for councils and commissions to meet virtually, for voting members. At this point, Council membership dropped by more than 50%, including two members representing Business, Industry, and Labor. The SRC also lost two members who represented former clients of ORS and one former client of ORS. The Council lost three members from the Department of Education, one working with transition, and the other two working with collaboratives in different parts of the state.

Over the past year, the Council has collaborated with the Governor’s Commission on Disabilities, and other state organizations representing all Rhode Islanders, to get the telecommunications participation for voting members reinstated, but the issue has stalled in the State Legislature.

Given the nature of this Council, and the number of people who either have a disability that makes them susceptible or have a vulnerable disabled child of family member at home, it is not surprising that concerns around COVID have diminished its in-person numbers. The SRC is currently working on new recruitment ideas and will seek help from the National Coalition of State Rehabilitation Councils, as well as the Office of Rehabilitation Services to assist us with this. The SRC welcomes help from ORS with recruitment of new membership.

(b) Comprehensive Statewide Needs Assessment (CSNA)

The SRC worked with DRRI and ORS on the Comprehensive Statewide Needs Assessment. The responses to the survey concerning areas of need were wide-ranging. It is concerning that RI ranks 19th in the US for employment of individuals with disabilities, with only 40% of adults with disabilities employed in Rhode Island.

ORS staff has requested that the agency provide services for job development, job clubs, vocational evaluations, etc., within ORS, rather than relying on CRP vendors to provide these services. The Council supports this approach, given some of the other findings of the CSNA. For example, ORS staff noted that clients often had other barriers to employment (the fear of losing benefits, social aspects of work). ORS Counselors would be in a unique position to be more actively involved and have the ability to address these other barriers with clients if these services were to be provided in- house at ORS.

The SRC had the following questions regarding this section of the plan.

1. How is ORS enhancing the Sherlock Plan?
2. Are there things ORS can do to alleviate the fears of losing Social Security benefits?
3. What types of outreach are being done with vendors?
4. What other training does ORS offer to meet service delivery needs by providing training to vendors?
5. Could ORS be more specific about the training?

(c) Goals, Priorities, and Strategies

ORS recognizes that one challenge with engaging students who have 504 Plans is the stigma of identifying with a disability. The SRC suggests arranging contact with successful individuals with disabilities in a variety of fields. Exposure to professionals with disabilities can help to reduce some of the misconceptions that remain and might make students with 504 Plans consider engaging with ORS. In addition, the rebranding/renaming of Vermont’s VR agency seems to have met with success by removing the word “rehabilitation," which is often misunderstood by both younger people and employers. The SRC would like to know if ORS has more specific plans to move forward with their own rebranding efforts.

(d) Evaluation and Reports of Progress- VR and SE Goals

ORS shared that it has been unable to form an alignment methodology of On-the-Job Training (OJT) but will continue efforts with DLT. The SRC would like more information on how ORS plans to alter its strategy to make OJT possible.

The SRC is pleased that ORS has continued the Project Search initiative. As reported in the State Plan update, the engagement of an out-of-state vendor has produced positive initial results, engaging two prominent businesses to help develop relationships with businesses in Rhode Island.

Additionally, ORS encouraged vendors to provide a full continuum of SE Services including Pre-ETS and worked with providers to explore impediments to service delivery and strategized solutions to overcome obstacles. ORS also reviewed fee structure and increased fees for services for many services to allow CRPs to have a more stable workforce and fiscal outlook.

The SRC feels these are positive moves forward. However, the SRC would like to see more vendors and employment agencies, like Goodwill Industries of Rhod Island and other agencies with a broader range of services.

(e) Supported Employment Services, Distribution of Title VI Funds

ORS’s investment in a strong presence for transition-aged youth at high schools pursuant to the DOJ consent decree is helping to keep the focus on the expectation of successful employment outcomes for students with disabilities, as well as the services that are needed to achieve employment that ORS can provide. The SRC acknowledges that ORS is committed to providing extended services for supported employment up to age 25 for individuals with the most significant disabilities. We would like to see ORS invest as strongly in the initial years of transition planning (beginning at age 14, as required by state and federal law), as beginning services at this time result in better outcomes for job placement and success as youth approach age 25.

(i) Comprehensive System of Personnel Development

ORS has revealed in recent years that recruitment and retention issues remain a concern. Currently, some Supervisors are taking on some of the caseloads of the Counselors in order to meet statutory requirements under the Rehabilitation Act. The SRC believes that ORS should be doing even more to attract new talented and qualified individuals, and we recognize the additional initiatives presented in this plan update. Without enough highly qualified staff, clients who need ORS services will be at risk of not reaching their goals of competitive, integrated employment.

The SRC remains concerned that the Counselor vacancies are destined to continue as more ORS personnel are retiring over the next few years and recruitment is not meeting the demand.

Additionally, compensation for RI ORS Counselors has been found to be not commensurate with that of neighboring states. These legitimate challenges need to be offset by innovative efforts to attract and retain qualified professionals.

The SRC recognizes that ORS has taken suggestions from previous updates to the plan and has looked for creative ways to address its staffing deficiency. For example, ORS has recently hired five (5) Rehabilitation Technicians who function as case aides to assist Rehabilitation Counselors until additional master’s level staff can be hired, or other options are developed. The SRC would like to see the establishment of a program that would provide these Rehabilitation Technicians with the financial support needed to obtain the education and experience to meet the ORS master’s degree requirement (i.e., substantial tuition assistance). Adding a tangible incentive to the mentoring and real-world experience that ORS already provides could create a stream of qualified candidates who are able to pursue the credentials needed and move into the role of Rehabilitation Counselor. The SRC supports ORS’s efforts to create a pathway for non-master’s degree candidates to move into the Rehabilitation Counselor role.

(l) Interagency Cooperation with Other Agencies

*State programs conducted under section 4 of the Assistive Technology Act of 1998:*

The SRC urges ORS to educate consumers about DRRI’s ability to assist consumers who are experiencing delays or denials regarding Assistive Technology devices or services. Additionally, the ability of ORS to provide in-house training is a step toward maintaining and increasing the number of referrals for AT services and devices through ORS. Training must also include the fact that AT is excluded from ORS’s comparable benefit requirement.

*Noneducational agencies serving out-of-school youth:*

Out-of-school youth remain an underserved or unserved population and reaching those youth is critical. The State Plan must identify the reasons the subcommittees for youth did not meet this year, and whether these meetings are scheduled to resume in 2024 (and if not, why that is).

Additionally, with respect to employment goals and skilled job opportunities, SRC requests that ORS provide more specific information regarding outcomes and goals within the State Plan.

The Council was unsure of which section to apply to the following topics.

Community Rehabilitation Program (CRP)

1.  ORS has described training opportunities for CRP staff. The SRC would like to know how effective is the training? Has it led to better outcomes for ORS customers?

2.  SRC wanted to see data in general (e.g., What percentage of the ORS budget is devoted/spent on Supported Employment? What percentage of the total ORS caseload is non-Supportive Employment or and Pre-Employment Transition Services?)

Thank you for the opportunity to comment on the update to the two-year VR portion of the Combined State Plan. We are encouraged by the changes ORS has implemented based on needs assessments over the past few years. We look forward to a continuing collaboration to ensure that all Rhode Island residents with disabilities will have equal access to employment services and jobs of their choosing in settings of their choice.

##### 5. Provide the VR agency’s response to the Council’s input and recommendations, including an explanation for the rejection of any input and recommendations.

List each recommendation/input followed by the VR agency response

The Office of Rehabilitation Services (ORS) thankfully appreciates the following opportunity to respond to the comments and recommendations from the State Rehabilitation Council (SRC) of the VR portion of the 2024 Combined State Plan. ORS has addressed each comment in the order in which the SRC presented them.

(a)            State Rehabilitation Council

ORS thanks the SRC for contributing to this section of the state plan, while providing helpful and valuable information that represents the how and why of the composition of their council. ORS is delighted to hear that the SRC welcomes help from ORS with recruitment for SRC new membership and would like to collaborate with the SRC on building joint strategies for recruiting new members, such as:

* Collaborating with community organizations such as Independent Living Centers (ILCs) to identify potential SRC candidates.
* Partnering with ORS to create and launch a targeted advertisement campaign encouraging VRC’s to identify potential SRC candidates.
* Planning and holding SRC recruitment events to identify potential SRC candidates.
* Increasing availability and accessibility of SRC materials online and developing a robust communication, marketing, and branding strategy for SRC.
* Developing print and social media recruitment strategies with the committee, in addition to eliciting suggestions to the committee for any additional recommendations for the most effective print and electronic media materials to reach potential committee members.
* Ensuring that as a council vacancy opens, the SRC chair(s) will recruit, recommend, and consult with the Governor’s Office to ensure membership compliance with the Rehabilitation Act.
* Working with the SRC to actively recruit and outreach with business and disability organizations to educate them on the services of ORS and the purpose of SRC.
* And continually reviewing and updating the SRC portion of the ORS website and explore including an informational video to be developed in conjunction with the SRC.

(b)   Comprehensive Statewide Needs Assessment

ORS thanks the SRC for their comments in this section. ORS continuously strives to deliver excellent service to individuals with disabilities in RI. With this being our primary goal, percentages and rankings are secondary. However, ORS is proud of the fact that RI ranks 19th in the US for employment of individuals with disabilities. This figure means that RI is in the top 62nd percentile and out-performing 30 of the other 49 US states, with only 36% (18 of the 49 other) of US states out-performing RI. Additionally, ORS strives for ALL Rhode Islanders with disabilities to be employed.   Rhode Island has been an Employment First State since 2014.  As of 2022, the national average of adults with disabilities who are employed is 21.3%. ORS is proud of efforts here in RI that have resulted in a nearly doubling the national average statistic.

ORS thanks the SRC for their questions on how ORS could collaborate efforts on enhancing the Sherlock Plan and alleviating individuals’ fears of losing social security benefits.  ORS continues to work with the Sherlock Center Work Incentive Planning and Assistance (WIPA) program to provide valuable information to individuals receiving SSI and SSDI through orientations and other public forums,  Our Assistant Administrator of Supported Employment is on a committee with other State Agencies and other collaborators to increase usage and awareness of the Sherlock Plan and to create marketing techniques to alleviate the fears of working while collecting social security benefits.

ORS thanks the SRC for asking about outreach to vendors and training that ORS offers to vendors regarding service delivery needs, and acknowledging the great efforts ORS has made with our vendors. ORS is proud of efforts from our Business Engagement Specialist Team (BEST) who work with our Assistant Administrator of Vendor Affairs & Workforce Development, Assistant Administrators for Supported Employment and Transition towards continuing the good relations with our CRP’s, helping them to increase the number of services offered and the ongoing efforts they take to recruit new CRP’s and services for individuals open and active with ORS.  ORS recently sent out a survey for innovative strategies to CRPs and met individually with each to identify and incorporate new ideas and strategies for services. ORS also works collaboratively with BHDDH via the Sherlock Center on regular scheduled Behavioral Health and Developmental Disabilities Supported Employment Council meetings to deliver training, best practice technical assistance, and strategize how best to meet the needs of the mutual clients each agency works with.

( c )                  Goals, Priorities, and Strategies

ORS thanks the SRC for their comments pertaining to this section. ORS is committed to exploring how best to initiate and move forward with agency rebranding, as Vermont and Massachusetts have both done, to promote awareness of ORS services and increase hiring initiatives for individuals with disabilities while working on lessening the unintended stigma of the word “rehabilitation.”

( d )                  Evaluation and Reports of Progress – VR and SE Goals

ORS thanks SRC for their comments on this section and in particular, OJT and CRP’s. ORS is currently exploring ways to model our efforts after the DLT work immersion program.  ORS continues to collaborate with DLT on these efforts and hope to have resolution during this State Plan.  Additionally, ORS has added more services – including virtual options -- and increased fees paid to our vendors. Offering more employment and job development services is part of our ongoing efforts to increase service delivery needs.

( e )                  Supported Employment Services, Distribution of Title VI Funds

ORS thanks the SRC for their comments and concerns for transition-aged youth. ORS shares a large interest in this area. Our ORS Assistant Administrator of Transition is currently involved in a Pre-ETS program to expand ORS assistance to middle-school youth.  ORS has reached out and presented to the School Guidance personnel at the RI School Counselor Association Conference.  The hope was to educate school counselors and guidance counselors on ORS services, as in many schools the 504 coordinators are guidance personnel.  ORS also has a VR Counselor assigned to every public high school as well as private and alternative schools, where they meet with guidance departments and teachers to discuss and educate on the benefits of ORS services and make referrals. ORS currently has Pre-Employment Transition Services (Pre-ETS) that start at age 14 in the Middle School and continue to age 22.  Our earliest service is a work readiness 101 program for Middle School students, which begins with developing an understanding of the job market, employer expectations, and how to match interests with careers. We have a wide range of services specifically developed to give youth in transition many opportunities to be well developed and ready for post school success.  These services include Work Readiness, Job Exploration, Community Based Work Experiences, Summer Work Experiences, Summer Employment Alliance, Project Search, Tri-Employment, Interviewing Skills, STARTURI and Rhode to College.  We also collaborate with partners and school districts for student events that include the College Forum and Dare to Dream.  ORS has also worked collaboratively with our CRPs to expand our Pre-ETS deliverables to those students who will require supported employment supports to gain employment, preparing them earlier with the knowledge and skills they need to be successful prior to exiting high school as well as working collaboratively with families, fellow state partners, schools, and CRP’s in connecting them with the appropriate long term supports as they transition into post high school life.   Our ORS Assistant Administrator of Transition is currently involved in a Pre-ETS program to expand ORS assistance to middle-school youth**.** Additionally, the five new Rehabilitation Technicians at ORS are assisting our agency in working with our Youth in Transition, from students with disabilities starting in Middle School and participating in Pre-ETS to our out-of-school youth up to age 24.

(i)           Comprehensive System of Personnel Development

ORS thanks the SRC for their comments and suggestions on ORS personnel development.  Despite ORS staff covering some extra caseload duties, this is not new to the culture and dynamics of ORS personnel.  Our counselors and supervisors consistently extend their help in any way they can to improve the strength of service delivery to our consumers. This practice has been ongoing for many years, with or without caseload vacancies, to improve the lives of our consumers, along with sustaining a high degree of value to our agency. ORS has always had a culture of helping those in need, which is reflective upon the consistent integrity and dedication of ORS staff.

ORS thanks the SRC for mentioning their findings of ORS staff compensation not being commensurate with that of neighboring states. The majority of ORS staff are union employees, with wages fixed by the Department of Administration (DOA). As a result, ORS administration does not have the ability to alter staff compensation. Additionally, neighboring states offer more teleworking options to their staff as part of their flexible compensation and union contracts. Even though ORS supports a healthy mix of teleworking, fieldwork, and office working, the Department of Administration dictates the mechanic of the telework program.

ORS thanks the SRC for recognizing the efforts ORS continues to take towards fully staffing our agency and noting our recent hiring of five Rehabilitation Technicians who function as assistants to our Rehabilitation Counselors. A point of clarification, these Rehabilitation Technicians are not case aides and function to help Rehabilitation Counselors with some data and record collection and Pre-Employment Transitions Service monitoring.  ORS has undertaken many efforts outlined in the 2024 Combined State Plan in our ongoing pursuit of recruiting new staff members to our ORS team.

ORS would like to thank the SRC for their suggestion that ORS provide incentives and tuition assistance that might help the Rehabilitation Technicians to obtain the education and experience to meet the ORS master’s degree requirement.  ORS has provided the Rehabilitation Technicians information about RSA-funded Rehabilitation Counseling programs.  Such initiatives are a longer-term option for ORS.  However, ORS thanks the SRC for supporting ORS’s efforts to create a pathway for non-master’s Rehabilitation Counseling degree candidates to move into the Rehabilitation Counselor role.” ORS is thankful to have support from the SRC in finding alternate methods to help fill vacancies.

( l )                  Interagency Cooperation with Other Agencies

ORS thanks the SRC on their comments and concerns in this section, particularly regarding Assistive Technology (AT) and out of school youth.  ORS continues to monitor the Assistive Technology Access Partnership (ATAP) Federal Contract and Adaptive Telephone Equipment Loan Program (ATEL) which provides access to assistive technology for device loan equipment, training, access to training, and to make informed choice.  ORS continues to support individuals with access to assistive technology and training to support vocational goals through a fee-for-service model.  ORS recognizes that individuals predominantly have a personal cell phone or access to a tablet, and these can be effective as a vocational tool to assist with executive functioning needs and job support.  ORS has partnered with assistive technology practitioners, has offered training, continues to update the assistive technology knowledge base, and will continue to offer training to ORS Supported Employment Counselors on the benefits and utilization of assistive technology as a job retention tool.  ORS has been collaborating with BHDDH (DD and Behavioral Health) on this effort through Supported Employment Council (SEC) meetings and working with BHDDH via their NEON Grant and DD Supports specifically related to assistive technology.

Finally, ORS would like to thank the SRC for the continued partnership and commitment to improve and expand on the services that ORS provides to individuals with disabilities.  We thank the SRC for asking for data towards a better understanding of the efficacies of VR service delivery.  We will work with the SRC during this Plan to devote time in meetings to delivering this data along with some necessary background.  We look forward to working together to provide the best services that vocational rehabilitation can offer to clients and participants.

#### 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;

The Rehabilitation Act of 1973, as amended, mandates that the Rhode Island Office of Rehabilitation Services (ORS), in partnership with the State Rehabilitation Council (SRC), complete a Statewide Comprehensive Needs Assessment (CNA) at three-year increments. The CNA is intended to identify the needs of individuals with the most significant disabilities, including those in need of Supported Employment, who identify as minorities with significant disabilities, underserved or unserved individuals, youth with disabilities and individuals with disabilities served by other components of the workforce development network. In addition, the CNA is intended to identify the need to develop or improve Community Rehabilitation Programs (CRPs). ORS views the CNA as a dynamic and evolving process that incorporates information from several diverse sources rather than from any one event or data source.

* ORS and the State Rehabilitation Council (SRC) will be completing a CSNA in FFY2024/2025.  ORS and the State Rehabilitation Council (SRC) jointly completed a CNA in FFY 2021 for the FFY2022 State Plan.  This assessment incorporated the new WIOA regulations and focused on the rehabilitative needs of individuals with disabilities residing within the State, particularly the VR service needs of those:
* With the most significant disabilities, including their need for supported employment services;
* Who identify as minorities;
* Who have been unserved or underserved by the VR program;
* Who have been served through other components of the statewide workforce development system; and
* Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.
* ORS and SRC addressed the Statewide Comprehensive Needs Assessment using several resources including:
* Community Comprehensive Needs Assessment Surveys for community rehabilitation providers (CRP)
* Employer Comprehensive Needs Assessment Survey
* Customer Satisfaction Survey
* Environmental Scan of Data including: Department of Labor & Training data, Bureau of Labor Statistics, Disability employment statistics, US Department of Labor, RI Department of Education, Kids Count, Social Security Maximus/RI Ticket to Work Program and the Office of Disability Employment Policy
* Office of Rehabilitation Services Staff Comprehensive Needs Assessment Surveys
* Focus group with transition age youth/consumers and parents and ORS staff members.

ORS will:

1. Continue increasing the capacity and knowledge base of CRPs who provide Supported Employment services;
2. Continue to improve access to vendors, awareness of cultural issues and distinctions, make services readily available for emerging populations/minorities, as well as access to services for individuals who are not English-speaking;
3. Explore available options for Transportation to services;
4. Increase the capacity of CRPs to conduct vocational evaluations and situational assessments that focus on meaningful integrated and competitive employment;
5. Look to CRPs to continue to develop a continuum of Supported Employment services for individuals with Behavioral Health and Intellectual/Developmental disabilities and to expand the number of qualified trained personnel to allow for the provision of supported employment services.

###### B. Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program;

The CNA is intended to identify the needs of individuals with the most significant disabilities, including those in need of Vocational Rehabilitation services, who identify as minorities with significant disabilities, underserved or unserved individuals, youth with disabilities and individuals with disabilities served by other components of the workforce development network.   The Comprehensive Needs Assessment (CNA) completed in 2021 identified the following as the most unserved/underserved populations served by the VR program:

1. Those with Physical Disabilities
2. Those with Intellectual and Development Disabilities
3. Those with Behavioral Health/Mental Health
4. Those with Blindness/Visual Impairment

**ORS will explore:**

1. Enhancement of the cultural competency of ORS staff and CRPs to specific minority populations within the State;
2. Incorporate interpretation and communication needs into the IPE for underserved, unserved and minority populations;
3. Engagement of the American Indian/Alaskan Native, Pacific Islander/Native Hawaiian and Asian communities through outreach and marketing strategies;
4. Increased access to services for individuals who are not English-speaking or have English as a second language;
5. Ensuring services are readily available for emerging populations/minorities.

###### C. Individuals with disabilities served through other components of the workforce development system; and

**The Results of the CSNA showed that:**

Individuals with behavioral health, deaf/hard of hearing, communication disorders and respiratory disabilities were indicated as the least served by the Workforce Development System (WDS).  Employers were also asked what ORS needs to do to be viewed as a viable workforce resource similar to JobsinRI, or DLT.  Responses overwhelmingly centered around marketing, specifically, through public announcements, commercials, signs, larger online presence, or website directory for potential job candidates that employers can access.  Five of the 13 respondents (38%) indicated they did not know or could not offer a suggestion.  Respondents indicated that ORS can better collaborate with WIOA partners and the WDS through communication, information sharing, meetings, and training.  When asked what populations staff see as underserved and/or emerging populations, respondents indicated individuals with mental health issues (20%), autism (20%), minorities (18%), youth (11%) and anxiety concerns (5%).   As part of the results of the CSNA, ORS will explore :

1. Better collaboration between ORS, WIOA partners and the Workforce Development System through communication, information sharing, meetings, and training.  In these collaborative efforts, identify and develop services and training to assist individuals with disabilities who the CSNA results identified as being in underserved or minority populations.
2. Additional collaboration with the Workforce Development System to improve service delivery to Cape Verdean, American Indica/Alaskan Native, Pacific Islander/Native Hawaiian and Asian.
3. Dissemination and/or awareness of resources available through the workforce development system and increased awareness of employer resources.
4. Increased outreach to individuals with behavioral health concerns, those who are deaf/hard of hearing, and those with communication disorders and respiratory disabilities are the most unserved/underserved by the Workforce Development System.

###### 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.

The 2021 Comprehensive Statewide Needs Assessment (CSNA) identified 24,548 students between the ages of 3-21, in RI, with IEP’s. This number could include students in a school setting, individuals who are home-schooled, individuals in other types of non-traditional school settings, etc.  Students with 504 plans are underserved and students with behavioral health concerns are also an underserved population.

ORS continues to enhance and expand access to Pre-ETS including those students in juvenile justice system, an additional unserved/underserved population.

“At-risk” students with learning disabilities who at times do not want to be identified as having a disability; and therefore, are not potentially accessing services.

Students indicated a positive experience with ORS, and that the referral process was seamless. Students also indicated job explorations in different employment fields and internships in those settings are important to them, as they indicated their top priority is working in a setting that interests them.

Per the CSNA, students (and their parents) indicated they are unaware of the full scope of services available to them from ORS and what services ORS may, or may not, fund. Parents stated that communication between all professional team members on behalf of the student is a key to success.

Based on the findings of the Transition focus group, the following possible strategies will be explored:

1. Continue to foster, promote, and encourage students with disabilities to have direct involvement with their ORS counselor and ORS case, as this method ensures the need for consistent engagement between ORS and consumers;
2. Continue to grow opportunities for youth with disabilities to access ORS information outside of school (mental health centers, youth centers, higher education, etc.) to capture more youth with disabilities in need of ORS services;
3. Continue expanding outreach to other programs, such as youth centers, family resource centers, and career and technical education programs to help youth with disabilities receive the counseling guidance and services they need;
4. Assist schools in increasing communication and coordination for “at-risk” youth with disabilities;
5. ORS to continue an increased involvement with out of school youth through career education programs. Additionally, 70% of CRP’s surveyed in this CNA reported that they are providing services to out of school youth with disabilities (with only 17% of those CRP’s also identifying themselves as an agency specifically providing transition services);
6. Develop a clear understanding of the breadth of services that ORS can provide to students with disabilities. This would provide more informed choice and further promote independent, confident decision-making ability from those students and their parents/guardians;
7. Increase outreach to work with those who are SSI/SSDI beneficiaries with an assignable TTW;
8. Remind students with disabilities and parents of the options they have while working with ORS, increasing the level of independent involvement throughout their case;
9. Continue building frequent communication and check-ins between the ORS counselor and students with disabilities/parents;
10. Continue group effort involvement in services for transition-aged youth with disabilities (i.e. student with disability, parent, special education teacher, vendor, ORS counselor, etc.).

##### 2. Identify the need to establish, develop, or improve community rehabilitation programs within the State.

ORS and the SRC distributed a survey via email to sixty-two Community Rehabilitation Providers (CRP’s) who are approved vendors of ORS.  Twenty-three CRP’s responded, for a response rate of 37.1%.  CRP’s were asked questions that ranged from demographic information, satisfaction with ORS services, suggested areas of improvement and how to strengthen collaboration to better serve PWD’s.  Demographic information collected in the survey included the geographic region where services were provided, type of services, primary population and ethnic population served, and whether their organization provided services for emerging populations with barriers to employment.

All respondents provide services to underserved and/or emerging populations with barriers to employment. They identified the largest amount of underserved and/or emerging populations who receive services are individuals from the following groups:

•      70% - Out of School Transition Youth

•      70% - Developmental Disabilities

•      70% - Behavioral Health Disabilities

•      35% - In-School Transition Youth

•      35% - Homeless

•      17% - Veterans

•      9% - Formerly incarcerated (juvenile and adult prisons)

•      9% - RIWORKS participants

All respondents indicated their organization has the time and resources to provide SE services, including but not limited to obtaining and maintaining employment. Additionally, 95% indicated they can help people access SE employment related programs and services.

Systemic barriers identified as barriers to employment included job availability (88%), transportation (86%), availability of job development (62%), availability of retention supports (60%) and cost of job accommodations (54%).

Financial barriers to employment included the fear of losing benefits and other associated financial supports. The areas selected frequently or occasionally was the fear of losing SSI or SSDI (91%), losing subsidies (i.e. housing, food stamps, etc.) (77%) and fear of losing medical benefits (78%).

Items rated as rarely or never in terms of employment barriers included staff skills and knowledge (63%), staff expectations (63%), availability of job accommodations (45%) and availability of job development (38%).

Individuals with behavioral health, deaf/hard of hearing, communication disorders and respiratory disabilities were indicated as the least served by the workforce development system (WDS).

Individuals with developmental disabilities, blind/visual impairments and mental/ behavioral health disabilities were viewed as the most underserved disability populations in RI.  CRPs suggested the need for stronger partnership with BHDDH, community outreach programs, employment collaboratives and interpreting services as ways to best connect and support these populations.

Providers offered feedback as to what would help their agencies meet the needs of consumers. Increased awareness of resources through ORS/WDS, increased awareness of employer resources, increased access to/better communication with ORS counselors and increased communication regarding changes/additions to policies.

Other suggestions for improvement consisted of streamlining/reducing the amount of ORS paperwork, ORS’ continuance to offer training opportunities to providers and strengthening liaison relationships between providers and ORS.

Employers were also asked what ORS needs to do to be viewed as a viable workforce resource similar to JobsinRI, or DLT. Responses overwhelmingly centered around marketing, specifically, through public announcements, commercials, signs, larger online presence, or website directory for potential job candidates that employers can access. Five of the 13 respondents (38%) indicated they did not know or could not offer a suggestion.

The Employer survey was completed by 13 employers throughout the state of RI. The employer survey yielded the following areas as needs:

1. Access to or knowledge about accommodations, safety concerns, and having the skills to do the job were the largest challenges faced when hiring a person with a disability.
2. Assess to or knowledge of persons with disabilities need for time off, dependability to come to work, getting hurt, and potential lawsuits were the largest concerns in hiring people with disabilities.
3. ORS could perform marketing through public service announcements, commercials, signs, a larger online presence and/or a website directory for potential job candidates that employers can access as ways ORS could be viewed as a viable workforce.

**Meeting the needs of the Business Community:**

1. Increase marketing and awareness of ORS services.

2. Enhance presence at business expos, job fairs and continue an ever-increasing online presence via agency website, social network platforms, etc.

3. Provide Business Community with information on ADA and workplace accommodations

The Employer survey also indicated that Diversity, work ethic, and performance of the job duties were the largest rewards in hiring individuals with disabilities. Good candidates with qualifications were the primary motivation in employing people with disabilities.

The CSNA identified a need to develop and improve CRPs.

**Meeting the Needs of the Consumer:**

1.            Hold monthly/quarterly meetings with CRPs to ensure service delivery is meeting our expectations.

2.            Create pilots for job preparation, trainings for Supported Employment Council through Innovative Strategies meetings.

3.            Assistant Administrator of Transition will continue to explore new pilot program that will be rolled out next SY24/25 that is  a partnership between ORS, CRPs, and individual school districts throughout RI.

**CUSTOMER SATISFACTION SURVEY**

The two ORS re-designed monthly consumer satisfaction surveys (completed with input from the SRC State Plan, Policy and Quality Assurance sub-committee) was designed as an ongoing tool to be distributed at set intervals and provides longitudinal data on customer satisfaction. Surveys are sent to customers who have open cases with ORS, are in post-employment plan services and employment status. The re-designed surveys assist in capturing WIOA data and undergoes continued phases of analysis as an ongoing process.

The conclusions formulated on the results of the Surveys conducted between April 2020 and March 2022 indicated the following needs:

1. ORS can improve services by increasing communication with consumers, helping customers obtain employment, networking with employers and increasing staff and resources.
2. Nothing, or already being satisfied with ORS services, was the second most occurring response.

Additionally, the Customer Satisfaction Surveys indicated that:

1. Supported employment, job placement, job development, and job coaching were indicated as the most important services.
2. Transition-aged individuals aged 14-24 were the largest population of survey respondents at 30% of all individuals who responded in the survey.
3. Individuals with mental health, developmental and cognitive disabilities were the most frequently identified of individuals who responded in the survey.
4. Response rate of those who identify as minorities rose since the 2021 CNA, with respondents indicating themselves 67.5% as White/Caucasian, 17.5% as Black/African American, 8% as Hispanic/Latino, 3.5% as American Indian/Alaskan Native and 3.5% as Asian.
5. Three-quarters of respondents indicated that ORS matched their stated employment goals, that they feel better prepared to enter employment, that their counselor responds to them within 2 business days, that they would recommend ORS services to family and friends, and that they receive SSI/SSDI.

The further conclusions based on the results of the surveys conducted between April 2022 and March 2023 indicated the following needs:

1. ORS can improve their services helping customers obtain employment, increase communication with consumers, helping customers obtain education, networking with employers.
2. Nothing, or already being satisfied with ORS services, was one of the most frequently occurring response.

Additionally, the customer satisfaction surveys from April 2022 and March 2023 indicated that:

1. Supported employment, job placement, job development, job coaching, and counseling & guidance were indicated as the most important services.
2. Transition-aged individuals aged 14-24 were the largest population of survey respondents at 32% of all individuals who responded to the survey.
3. Individuals with mental health, developmental and cognitive disabilities were the most frequently identified individuals who responded to the survey.
4. Response rate of those who identify as minorities during April 2022 – March 2023 stayed roughly the same since the 2021 CNA, with respondents indicating themselves 72% as White/Caucasian, 17.33% as Black/African American, 11.33% Hispanic/Latina, 6% as American Indian/Alaskan Native and 2.33% Asian.
5. Over three-quarters of respondents indicated that ORS matched their stated employment goals and interests, that they receive services in a timely manner, and that they would recommend ORS services to family and friends.

**ENVIRONMENTAL SCAN**

The environmental scan included information from a variety of sources such as: RSA data, RI Department of Labor & Training (DLT) and Department of Labor - Bureau of Labor Statistics, Disability Employment Statistics-U.S. Department of Labor’s Bureau of Labor Statistics, RI Department of Education, Kids Count, Social Security Maximus Ticket to Work Office of Disability Employment Policy. The sources indicated the following:

1. 31% of workers with a disability were employed part-time, compared to 17% of workers without disabilities.
2. People with disabilities were more concentrated in-service occupations (19%) compared to those without a disability (17%).  PWD were more likely to work in production, transportation, and material moving (14%) compared to those without a disability (12%) and less likely to work in management, professional occupations (34%) and in Government (14%) compared to those without a disability (13%).
3. RI was ranked 19th in the nation for employing people with disabilities with 40.6% of individuals with disabilities in RI employed. Since the 2017CNA, jobs in RI fluctuated. From 2018 – 2019: RI gained jobs in retail trade, educational services, wholesale trade, arts, entertainment, recreation, natural resources and mining. RI lost jobs in professional services, business services, financial activities and construction. From 2019-2020: RI had a decrease in the job fields of accommodation, food service, health care, social assistance, professional/business service.
4. Kids Count data of youth in RI from 2018 – 2020 shows 3% of those aged 16-19 are out of school and not working; 11% of those aged 20-24 are out of school and not working; 9% of those aged 16 – 24 are out of school and not working. Over the past ten years, the number of out of school youth not working has declined by 5% in those aged 16-19, stayed the same in those aged 20-24, and declined by 3% in those aged 16-24.
5. Social Security/Maximus Ticket to Work RI data received for 6/30/2019 and 1/20/21 indicated that as of March of 2019, there were a total of 47,737 assignable beneficiary tickets in RI (currently not “in-use”).  32,149 of these tickets were in Providence County alone.  As of January 2021, there were a total of 45, 204 assignable tickets with 30,225 being in Providence County.  ORS-RSA-911 data for PY20 quarter two reflected a total of 1,510 applicants indicating being on SSI/SSDI at time of application. Data suggest PWD in RI on SSI/SSDI disability are potentially an underserved population.  It also suggests CRP education and program development on the benefits of becoming an Employment Network (EN) may be advantageous towards developing the continuum of employment network services for people with disabilities in RI. Currently, ORS and only one other EN is available within the state.
6. According to the RI Department of Education, their five-year strategic plan focuses on the following: increase retention on both students and educators; promote one student to computer training philosophy; expand student access to early college and career education training programs; expand and deepen college and career counseling services, while informing youth and adults into the decision making process; reach out to business and industries to partner with schools in the development and management of career and technical education programs; collaborate with districts, education providers and business providers to offer recognized, career-ready credentials and skills transcripts; reach out to employers and internship providers to partner with school districts to complete employability skills assessments and transcripts.

**VR COUNSELOR COMPREHENSIVE NEEDS ASSESSMENT**

ORS conducted two staff surveys in 2019 and 2020 to obtain information on how to improve service delivery, while remaining up to date with the evolving field of vocational rehabilitation.  The first survey pertained to best business practices as a state agency.  The second survey pertained to all descriptions directly related to WIOA-CNA focus areas.

The surveys reflected the following needs:

1. Sixty-six percent of staff indicated ORS should provide in-house services such as job development, vocational evaluations, job clubs, resume development, etc., directly, rather than relying on CRP’s solely for consumer service delivery.
2. Fifty-six percent of staff indicated they were satisfied with the consumer services provided by CRP’s. Services for individuals with behavioral health concerns, individuals with autism/ASD, individuals who identify as minorities, youth and individuals with anxiety rank as the top opportunities to improve outcomes for underserved or unserved groups.

Additionally, respondents indicated ORS can assist CRPs/vendors to meet service delivery needs by providing training to vendors, strengthening communication with vendors, and assisting vendors with report writing skills.

ORS should develop or identify more behavioral health vendors with the training and capacity to provide vocational services.

ORS can better collaborate with WIOA partners and the Workforce Development System through communication, information sharing, meetings, and training opportunities.

ORS continues to conduct staff surveys that will be incorporated into the 2025 VR Counselor Comprehensive Needs Assessment.

**WORKFORCE INNOVATION & OPPORTUNITY ACT (WIOA):**

As outlined by WIOA, and given the 21st Century understanding of the evolving labor force and the needs of individuals with disabilities, ORS staff indicated the following top 3 areas of training that would be most beneficial:

1. Employment trends/labor market information
2. Business engagement
3. Job development

#### 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

ORS, in conjunction with the SRC state plan team, routinely met to review the format and content of the state plan. Additionally, ORS and the SRC developed a state plan timeline regarding drafts, reviews, completed sections, feedback, edits, etc.  ORS’ goals and priorities, regulations, and planning activities are jointly agreed upon by the state agency and the State Rehabilitation Council (SRC). These goals are generated from the Statewide Comprehensive Needs Assessment (CNA), compliance with federal Performance Measures as stated in WIOA, monitoring reviews, quality improvement findings, and feedback from customers, advocates, and other stakeholders. Inherent in these goals is the belief that ORS will assist individuals with significant disabilities to move toward achievement of vocational goals, career development, and increased self-sufficiency.

The 2021 CSNA and subsequent SRC review indicated four goals ORS should work on for PY 2024 through PY 2025.  These four areas include:

1. Continued strategies to promote awareness of ORS and its scope of service;

2. Increase services to underserved and unserved populations;

3. Bridge gaps between employers and individuals; and

4. Help individuals to remove personal and other barriers they face to obtain and maintain competitive integrated employment.

##### 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, post-secondary 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.

List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority

***(A)  Support innovation and expansion activities.***

The following goals and strategies will be measured by utilization of our RSA911 data collected electronically through case management system, internal controls, customer satisfaction surveys, etc.

**GOAL 1: TO INCREASE AWARENESS OF ORS AND ITS SCOPE OF SERVICES**

ORS will set Region and/or VRC targets for applications and employment outcomes, thus allowing ORS to measure the following goal by monitoring the number of applicants, case reviews, increased referrals, and employment outcomes in PY24.

**OBJECTIVE 1**: Participate as active members in community forums, employer/job fairs, regional Chamber of Commerce meetings, Statewide Human Resource Management events, and Transition events.  ORS will utilize the strategies below to measure progress towards this objective and report progress Collaborate with the four Regional Transition Centers and Department of Behavioral Healthcare, Developmental Disabilities, and Hospitals (BHDDH) to present an Introduction to State Services to each public, private and alternative high school statewide to ensure consistent messaging occurs for schools, LEAs, and families on ORS services.

1. ORS will conduct a monthly orientation to VR services in English and Spanish in order to increase referrals and applications for services and will explore providing orientations at the American job centers.
2. Collaborate, facilitate, and participate quarterly with Sherlock Center and BHDDH on BH and DD Supported Employment Council meetings to increase knowledge base of providers and CRPs who offer Supported Employment.
3. Explore technical assistance from VRTAC-QM on how better to market ORS services to the public.
4. Develop video content/presentations regarding transition, general VR, SE, Pre-ETS, etc, and post on ORS website.
5. Develop an electronic “Introduction to ORS Transition Services” that will consist of necessary information about ORS and scope of services, including the Transition fact sheet, benefits counseling FAQ, and an introductory video; these materials could be customized to the individual VR Counselor and the students/districts they are working with.
6. Increase ORS on-line presence via LinkedIN, Work without Limits, Indeed, Facebook and other social media.
7. Present on ORS services at Developmental Disabilities Council meetings, Rhode Island Chapter of the Association for People Supporting Employment First (RIAPSE) and Rhode Island Rehabilitation Association (RIRA) events.
8. Conduct Liaison responsibilities training to staff.
9. Outreach to provider agencies and rehabilitation centers that have not referred in past two years to coordinate service orientation/presentation to staff and consumers.

**OBJECTIVE 2**: Utilize participation on Governor’s Workforce Board, Workforce Investment Boards, and other advisory groups to help ORS BEST team gather and provide current information about business sector needs and state responses.

1. Disseminate information from the quarterly GWB meetings to VR Counselors.
2. Educate and partner with WIOA partners to include requirements that target individuals with disabilities in their hiring initiatives.
3. ORS will explore collaboration with WIOA partners to enhance ORS Annual Employer Forum

**OBJECTIVE 3**: Develop, implement, and replicate the successful business partnerships already operating.

1. Implement, coordinate, and expand on Project Search sites to offer opportunities for internships and job exploration for adults and students with IDD.
2. Partner with emerging, high wage business sectors and DLT/RealJobsRI initiative to identify new employment opportunities for individuals with disabilities.
3. Increase business engagement activities by VR counseling staff via the internal Business Engagement Specialist Team (BEST) a group of dedicated VR counselors, supervisors and administrators who focus on increasing outreach to the business community.
4. Develop strategies to assist BEST to collaborate with other State agencies (including DLT and BHDDH) as per WIOA requirements to consider employers as another customer base of VR.
5. Educate and require BEST members to utilize an internal tracking tool to monitor employers/business contacts, industries.
6. ORS will educate staff about job board.
7. ORS will conduct liaison responsibilities training for staff.
8. Identify increased employer penetration via annual report to WIOA/DLT/GWB reporting.

***(B)  Overcome barriers to accessing VR and supported employment services.***

**GOAL 2: ORS will overcome barriers to accessing VR and supported employment services through the following objectives.**

ORS will utilize data collected from Case Management System and data provided by RSA in Dashboard Reports.  ORS will also utilize Pre-ETS real time data collected through participation in a grant that measures the effectiveness of services delivered under Pre-ETS.  Supported Employment Assistant Administrator will collect data from the results of a yearly innovative strategies survey.

**OBJECTIVE 1:** Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into competitive integrated employment.

1. In-School Youth with Disabilities: enhance and expand the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide work experiences to youth. ORS will continue to outreach to 504 Coordinators for Pre-ETS service identification and to identify “at risk” youth with behavioral health and learning disabilities who are potentially eligible but may not be accessing services.  ORS expanded its traditional Transition services to include middle school students with the goal of introducing Pre-ETS services at an earlier age.  This will give students an earlier look at potential career interests and pathways as they enter high school.   ORS hopes to continue to expand this service statewide.
2. ORS will collaborate with The Regional Transition Center, BHDDH, School Districts, and Adult Providers utilizing Griffin and Hammis in a Discovery School to Work pilot for more significantly disabled students in order to increase exposure to employment, improve employment outcomes, as well as providing a for seamless exit from school to adult life.
3. ORS Transition Counselors will be working collaboratively with School Districts, BHDDH, and CRPs to give mutual I/DD students the opportunity to participate in a wide range of exploration and community experiences with the goal of obtaining and maintaining employment prior to exit from high school.
4. Under the consent decree ORS has been tasked with supporting school districts with the goal of employment for all students on a Career Development Plan (CDP) prior to exit from HS.  ORS will be providing TA to schools around Job development and Job Coaching.  ORS will also utilize our Business Engagement team to assist districts in identifying businesses in their areas willing to offer employment experiences and opportunities.  ORS will offer SE JDP and coaching as needed to those students who have developed an IPE and have an identified job goal.
5. Assistant Administrator of Transition will be exploring new pilot program that will be rolled out next SY24/25 that is  a partnership between ORS, CRPs, and individual school districts throughout RI with the goal of bringing much needed employment skill development to students who will potentially require a higher level of support to obtain and maintain employment.
6. Adults with Disabilities: ensure a wide array of service providers and training programs are available to enable customers to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.
7. Design and modify programs and services as changing needs of customers are identified based on CNA responses.
8. Utilize benefits counseling forums and information sessions to identify beneficiaries of Social Security who may be an underserved or unserved population and who could benefit from connecting with ORS.
9. Continue to ensure benefits counseling is provided to those on SSI/SSDI who may be unserved/underserved at key points in the employment path via collaborative efforts with the Sherlock Center WIPA program or ORS fee for service programming.

**OBJECTIVE 2**: Ensure ORS materials meets the needs of populations being served and/or outreached to.

1. Partner with Dorcas International to identify underserved populations and identify specific needs for materials in alternative formats.
2. ORS will review data and determine alternate formats for underserved populations.
3. Work with WIOA Workforce Partners to determine additional needs of individuals not currently being served in the Workforce Development system with disabilities.

***(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 3:   TO PROVIDE A FLEXIBLE SERVICE DELIVERY SYSTEM THAT HELPS INDIVIDUALS TO REMOVE PERSONAL AND OTHER BARRIERS THEY FACE TO OBTAIN AND MAINTAIN COMPETITIVE INTEGRATE EMPLOYMENT:**

ORS will monitor the Rehabilitation Rate, utilize case review data, and RSA 911/Dashboard data to monitor the number of closures post IPE closed prior to a competitive integrated employment closure.

**OBJECTIVE 1**: Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into competitive integrated employment.

1. In-School Youth with Disabilities: enhance and expand the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide work experiences to youth. ORS will continue to outreach to 504 Coordinators for Pre-ETS service identification and to identify “at risk” youth with behavioral health and learning disabilities who are potentially eligible but may not be accessing services.  ORS has presented at the Annual RI School Guidance Counselor Conference to increase awareness of ORS services and referrals of 504 students.  ORS continues to provide and expand career awareness to Middle School students and families.
2. Adults with Disabilities: ensure a wide array of service providers and training programs are available to enable customers to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.
3. Design and modify programs and services as changing needs of customers are identified.
4. While the COVID restrictions have been lifted, ORS will continue to offer these virtual services on a hybrid basis and will utilize them for individuals who are not able to participate in face-to-face services due to health reasons, transportation issues, lack of CRP capacity in certain geographical regions, or disability-related issues.  ORS has found that having this hybrid model has allowed for increased efficiency for services, especially on a group basis; individualized services, however, have also been productive, especially when face to face employment services were not available.  ORS has utilized the array of Virtual Services for Pre-ETS, Supported Employment and non-Supported Employment programming.

**OBJECTIVE 2**: Change the culture of Supported Employment (SE) vendors to expect that competitive integrated employment is the goal from services.

1. ORS will utilize an innovative strategies survey to help identify areas of training needs for CRPs and implement training opportunities to improve services with an aim on best practice, and will also explore branching out with providers regarding specific fee-for-services such as job preparation.
2. Conduct quarterly VR meetings with SE (DD and BH) vendors to reinforce and strengthen Employment First principles and practice.
3. Support, facilitate, and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings to create opportunities for community of practice, creative problem-solving, information dissemination and training.
4. Encourage vendors to provide a full continuum of SE Services and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of full continuum of services.
5. Continue to examine annually and modify, as needed, the VR fee structure to ensure it rewards integrated employment outcomes.
6. Identify ways to continue to offer Virtual Service delivery options to optimize services to individuals who are unserved or underserved.

**OBJECTIVE 3:** Continue to explore ways to expand the Ticket to Work program and Employment Network capacity to ensure a continuum of available support and service delivery for clients who meet the Social Security Ticket Program eligibility.

1. Continue to identify gaps and strategize solutions in the Ticket to Work Program related to services and VR Cost Reimbursement process.
2. Acquire and onboard the J Morrow Ticket tracker” system into the InFormed ECMS program.
3. Continue to explore development of Employment Network Partnerships.
4. Continue to enhance staff knowledge of the Ticket to Work Program, including work incentives, referrals to Employment Networks, such as Work Without Limits attending trainings, sharing of relevant WIPA trainings and information, etc.
5. Remain active with CSAVR TTW Peer to Peer monthly meetings and SSA Quarterly All VR meetings.
6. Explore development of a Social Security Ticket to Work internal liaison team.
7. Continue to ensure benefits counseling is provided to those on SSI/SSDI at key points in the employment path via collaborative efforts with the Sherlock Center WIPA program or ORS fee for service programming.
8. Partner with Dorcas International to identify and reach out to culturally underserved populations to ensure awareness of vocational rehabilitation services.

***(D)   Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.***

**GOAL 4:** :

ORS will monitor and track following performance measures quarterly via WIOA PY24 and PY25 RSA911 data submittals and timely compliance of case movement of applicants to eligibility and to IPE.  ORS will also utilize Pre-ETS real time data collected through participation in a grant that measures the effectiveness of services delivered under Pre-ETS.

| Vocational Rehabilitation Program |  |  |  |
| --- | --- | --- | --- |
| **Program Year 2024** |  | **Program Year 2025** |  |
| **Expected Level** | **Negotiated Level** | **Expected Level** | **Negotiated Level** |
| Employment (Second Quarter after Exit) 22 | 48.6 |  | 49.6 |
| Employment (Fourth Quarter after Exit) 22 | 45.1 |  | 46.1 |
| Median Earnings (Second Quarter after Exit [[1]](#_ftn1) | 3549.00 |  | 3645.00 |
| Credential Attainment Rate | 33.7 |  | 34.8 |
| Measurable Skill Gains | 40.5 |  | 42.0 |

**OBJECTIVE 1:** Ongoing Strategies to Meet WIOA performance accountability measures.

1. Utilize tools, data and technical assistance provided by RSA in determining the final negotiated levels of performance.
2. Ensure the ECMS development encompasses the requirements for WIOA measures and data reporting.
3. Continue contributing reporting data elements as required to the Department of Labor and Training/lead WIOA partner in the state.
4. Continue to educate staff to the importance of timely and accurate ECF documentation of the WIOA data elements.
5. Utilize ECMS to develop a reporting system to account for the increase/utilization of Pre-ETS services and their effectiveness.
6. ORS is involved in the second year of a grant-funded three-year pilot to measure effectiveness of services delivered under Pre-ETS.  For each service provided under the 5 Pre-ETS categories, a pre and post assessment is done by vendor to measure skills or knowledge gained. Results go straight into a real-time database which is available to ORS and the vendors providing the service.
7. Participate in Technical Assistance opportunities on capturing performance measures.

**OBJECTIVE 2**: Meet the statutory requirements under the Rehabilitation Act and the implementing regulations.

1. Determine eligibility within 60 days of application.
2. Explore technical assistance with VRTAC-QM on Rapid Engagement Strategies regarding eligibility, plan development and movement to active services.
3. Determine and utilize presumed eligibility as relevant for SSI/SSDI disability recipients.
4. Develop the Individualized Plan for Employment (IPE) within 90 days of eligibility determination.
5. Utilize MIS to track adherence to these standards on a quarterly basis; utilize individual performance targets for staff to aim for.
6. Educate VR Supervisors and staff on best practices and procedures on relevant utilization for  eligibility determination and IPE extension process.
7. Educate VR Supervisors and staff on utilization of ECMS system through dashboard request to monitor their own 60-day and 90-day compliance and utilize performance targets to staff to aim for.
8. ORS supervisors and staff will utilize MIS system to better monitor annual reviews and IPE amendments to ensure service delivery to meet client’s changing needs.

**OBJECTIVE 3**:  Utilize available agency data through the Quality Improvement process to enhance and support program development, staff and vendor training and services to customers.

1. Review the current regulations and update procedures as needed based on QI data to ensure client access to services, supports and movement toward self-sufficiently and integrated competitive employment.
2. Review WIOA data contained in the RSA-911 and RSA Dashboard quarterly to assess agency outcomes, areas for enhancement and program development for staff, vendors, and customers.
3. Enlist VRTAC-QM as relevant to provide technical assistance.
4. Review relevant data and enlist support and assistance from SRC as relevant.
5. Continue monthly customer satisfaction surveys. Utilize findings to shape program development and service needs, vendor, and staff training.
6. Continue QI quarterly case reviews and targeted case reviews as relevant.
7. Utilize QI findings to shape procedural consideration, training needs, and program development.
8. ORS supervisors and staff will utilize QI resources to assist with monitoring of 60 day and 90-day compliance, annual reviews, and IPE amendments to ensure service delivery to meet client’s changing needs.
9. ORS is involved in the second year of a grant-funded three-year pilot to measure effectiveness of services delivered under Pre-ETS.  For each service provided under the 5 Pre-ETS categories, a pre and post assessment is done by vendor to measure skills or knowledge gained. Results go straight into a real-time database which is available to ORS and the vendors providing the service.

**OBJECTIVE 4**:  Provide agency staff with up-to-date tools and technology that enhance delivery of services to customers and capture reportable data.

1. Provide Staff Training and support as the agency transitions to new Electronic Case Management/MIS System.
2. Utilize the wage interface tool within the ECMS to upload reportable RI UI wage data.
3. Utilize available wage data tools such as the Work # available through DHS and State Wage Interchange System (SWIS) to capture WIOA Post Exit wage data for cases not available in the RI UI data base.  Explore ability to develop a wage interface tool to upload SWIS data into the new ECMS for reportable data collection.
4. Continue to educate and enhance agency staff’s knowledge and use of various electronic platforms that enhance the delivery of services to consumers such as Teams, ADOBE, virtual access, SharePoint, Zoom etc.
5. Acquire and onboard the J Morrow “Ticket” tracker system into the ECMS program.
6. Continue to utilize and provide CareerScope, Virtual Job Shadow, and explore other tools and resources that may make VR Counselor work more efficient, such as SARA.
7. ORS is involved in the second year of a grant-funded three-year pilot to measure effectiveness of services delivered under Pre-ETS.  For each service provided under the 5 Pre-ETS categories, a pre and post assessment is done by vendor to measure skills or knowledge gained. Results go straight into a real-time database which is available to ORS and the vendors providing the service.

#### 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;

List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies

The 2021 CNA and subsequent SRC review indicated four goals ORS should work on for PY 2022.  These four areas include:

1. Continued strategies to promote awareness of ORS and its scope of service;

2. Increase services to underserved and unserved populations;

3. Bridge gaps between employers and individuals; and

4. Help individuals to remove personal and other barriers they face to obtain and maintain competitive integrated employment.

**GOAL 1: TO INCREASE AWARENESS OF ORS AND ITS SCOPE OF SERVICES**

The strategies listed in Goal1 has led to an increase of 363 referrals from PY21 to PY22.  ORS has increased its use of on-line platforms to promote agency services and recruitment opportunities. While ORS made gains in reaching this goal, we continue to see it as a viable goal due to applicants’ numbers not being what the agency would like to see.  Ongoing challenges of staff shortages make dissemination of information challenging.

**OBJECTIVE 1**: Participate as active members in community forums, employer/job fairs, regional Chamber of Commerce meetings, Statewide Human Resource Management events, and Transition events.

* ORS participated as active members in various 4 community forums with ORS hosting one, weekly employer/job fairs, 4 regional Chamber of Commerce quarterly meetings, 2 Statewide Human Resource Management events, and four Transition events throughout the program year.
* ORS collaborated with Regional Transition Centers and Department of Behavioral Healthcare, Developmental Disabilities, and Hospitals (BHDDH) by presenting an Introduction to State Services to each public high school, as well as private and alternative schools, to ensure consistent messaging occurs for schools, LEAs, and families on ORS services.
* ORS collaborated with Sherlock Center and BHDDH on facilitation of BH and DD Supported Employment Council meetings to increase the knowledge base of providers and CRPs who offer SE.  ORS also funds these monthly meetings to include specific topics that are a directly related to the goals and requirements of the Consent Decree and overall Supported Employment services.
* ORS brought in Kincaid/Wolstein from Connecticut to work with Non-Supported and Supported Employment adults in the Northern region of Rhode Island.  Kincaid is also capable of providing Executive Functioning Assessments for adults and students.
* ORS explored technical assistance from VRTAC-QM on how better to market ORS services to the public.  ORS continues to work with the Department of Human Services Communications Team to expand and refresh our current social media communications.
* ORS has developed an electronic file “Introduction to ORS Transition Services” that consists of necessary information about ORS and scope of services, including the Transition fact sheet, benefits counseling FAQ, these materials are customized to the individual VR Counselor and the students/districts they are working with.
* ORS increased the Agency’s on-line presence via LinkedIn, Work without Limits, Indeed, Facebook and other social media.    ORS has utilized these social media platforms to post Agency job vacancies. An Employment Network MOU was developed with Work Without Limits increasing our presence on their platform.
* ORS presented and participated at Developmental Disabilities (DD) Council meetings, Rhode Island Chapter of the Association for People Supporting Employment First (RIAPSE) Rhode Island Rehabilitation Association (RIRA) events, Behavioral Health Work for Wellness, and Family Employment Awareness Training.
* ORS has contacted agencies to re-explore working together, but staff capacity at provider agencies is still a concern. ORS has offered training to new employees of the agencies in an effort to help with skill development.
* ORS has partnered with Easter Seals/Fedcap to provide TA to school districts on job development and job coaching.  This technical assistance will allow the school districts to be better prepared to meet their goals and responsibilities under the consent decree.  This TA has been offered and provided in both Job Development and Job Coaching 8 times this 2023-2024 school year.

**OBJECTIVE 2**: Utilize participation on Governor’s Workforce Board, Workforce Investment Boards, and other advisory groups to help ORS BEST team gather current information about business sector needs and state responses.

* ORS disseminated information about job leads via email to VR Counselors and BEST members daily.
* In collaboration with DLT, ORS and WIOA partners included requirements that target individuals with disabilities in their hiring initiatives.
* ORS has been unable to form an alignment for methodology of On-the-Job Training (OJT) but will continue efforts with DLT to explore possibilities.
* ORS has explored opportunities and presented with State Partners for collaborative and sequenced funding models for service delivery which resulted in a PowerPoint presentation and a booklet.
* ORS held two Employer Forums to allow BEST to assist with hiring needs of business sectors, as well as to increase disability awareness and reasonable accommodations.

**OBJECTIVE 3:** Develop, implement, and replicate the successful business partnerships already operating.

* ORS continued to implement and coordinate Project Search sites to offer opportunities for internships and job exploration for adults and students with IDD. ORS lost one adult Project Search site due to COVID but has since identified a new site to take its place. The new site is in the hospitality/service industry.    ORS will be exploring sites in other locations of the State.  ORS has three transition age Project Search programs, 2 hospital-based programs and one professional office-based program.  This past school year had an 88% employment rate over the three transition programs.
* ORS continued to partner with DLT/RealJobsRI initiative to identify new employment opportunities in emerging business sectors for individuals with disabilities.  The progress has been slow in this area because the focus has been on Consent Decree demands of the IDD population.  Discussions are ongoing.
* ORS BEST has participated in Chamber of Commerce events, job fairs, employer forums, and direct employer contact to assess the needs of the business community.
* ORS sponsored and conducted an Employer Forum at Rhode Island College, where employers, partners and other state agencies were invited to attend and learn about the benefits of hiring individuals with disabilities and how to access that pool of potential employees.  ORS plans to run this forum twice a year so that new businesses can be attracted, and current disability information and trends can be shared with the business community.
* ORS has had initial discussions to assist BEST to collaborate with other State agencies (including DLT and BHDDH) as per WIOA requirements to consider employers as another customer base of VR.  Discussion and development of a strategy is ongoing.
* ORS has developed a draft version of an internal tracking tool to monitor employers/business contacts, industries, ORS liaison, and job board.  ORS has developed a Teams page for BEST activities including tracking tool.
* ORS identified increased employer penetration via annual report to WIOA/DLT/GWB reporting. Information and Support Services were provided to 25 employers.  26 employers were provided Workforce Recruitment Assistance and 5 employers accessed untapped labor pools.
* ORS reintroduced application, IPE development and competitive integrated employment productivity goals for all VR counselor staff and decided against introducing productivity goals for BEST members only.

**GOAL 2: INCREASE SERVICES TO UNDERSERVED AND UNSERVED POPULATIONS:**

ORS continued to monitor an increase in engagement services with students who have 504 plans, provide employment readiness services to youth/adults who are incarcerated, and expanded access to 81 individuals in needs of benefits counseling services.

**OBJECTIVE 1**: Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into competitive integrated employment.

* In-School Youth with Disabilities: ORS continued to outreach to 504 Coordinators.  ORS presented at the Annual Rhode Island Guidance Counselor Conference to talk about services and referrals.  ORS continued to expand services to the many school districts throughout the state.
* ORS continued to work with the Rhode Island Training School as well as having meetings with the Dept of Corrections to offer and coordinate services to those “at risk” youth exiting these programs.  ORS has continually reviewed and expanded its traditional Transition services to meet the needs of school districts.  This includes middle school students with the goal of introducing Pre-ETS services at an earlier age.  This has given students an earlier look at potential career interests and pathways as they enter high school.
* ORS collaborated with The Regional Transition Center, BHDDH, School Districts, and Adult Providers utilizing Griffin and Hammis in a Discovery School to Work pilot for more significantly disabled students to increase exposure to employment, improve employment outcomes, as well as providing a for seamless exit from school to adult life.  The challenge remains vendor capacity in providing customized employment. The Discovery School to Work pilot was completed and has created a best practice in coordinating services for students exiting high school and entering adult services.
* Adults with Disabilities: ORS has worked with the providers to identify obstacles to service delivery which led to a fee for service rate review and increase to ensure a wide array of service providers and training programs continued to be available.  Several new vendors came on board to enable customers from underserved populations to participate in employment services.
* ORS continued to review, design, and modify programs and services as changing needs of customers are identified.  An example would be changes to driving evaluations and instruction including instructors speaking multiple languages.
* ORS counselors have participated in CHARLAS by LAZO for Spanish-speaking families, meeting them in the community to connect with resources and employment. Challenges have again occurred due to vendor capacity.
* ORS continued to fund benefits counselor time for benefits counseling forums and information sessions to identify beneficiaries of Social Security who may be an underserved or unserved population and who could benefit from connecting with ORS.
* ORS increased the fees paid for benefits counseling provided to those ORS customers on SSI/SSDI who may be unserved/underserved at key points in the employment path via collaborative efforts with the Sherlock Center WIPA program or ORS fee-for-service programming.  ORS also entered into an MOU with Work without Limits to enable referrals at time of case closure.
* ORS has created a Job Club which three vendors are offering that is a combination of job preparation and community-based work experience. This allows the vendor to reinforce what the client is taught.  Underserved populations such as individuals with Asperger’s or those who have a traumatic brain injury have benefited from this club.

**OBJECTIVE 2:** Ensure ORS material meets the needs of populations being served and/or outreached to.

* ORS continued to review and modify existing materials and develop new materials as needed in alternative languages, formats, grade levels, etc.
* ORS website is accessible in multiple languages and is ADA compliant.  All our materials meet accessibility requirements and the documents we provide allow for software and accessibility features in electronic devices for ease of access.
* ORS Monthly Consumer Satisfaction Surveys are provided in multiple languages and formats.

**GOAL 3: IDENTIFY STRATEGIES TO BRIDGE GAPS BETWEEN EMPLOYERS AND INDIVIDUALS:**

ORS tracked the employment rate during the school year for the three transition programs, also tracked information and support services to determine employer penetration during the past year for the WIOA Annual Report.  ORS also utilized productivity goals for VR Counselors to create a baseline measurement for applications, IPE development, and competitive integrated employment outcomes.

**OBJECTIVE 1**: Utilize participation on Governor’s Workforce Board, Workforce Investment Boards, and other advisory groups to help ORS BEST team gather current information about business sector needs and state responses.

* ORS continued to have two representatives on Governor’s Workforce Board who collect and disseminate information to VR Counselors.
* ORS has presented to Governor’s Workforce Board on services that ORS provides.

**OBJECTIVE 2**: Develop, implement, and replicate the successful business partnerships already operating.

* ORS continued to implement and coordinate Project Search sites to offer opportunities for internships and job exploration for adults and students with IDD.  ORS had one adult Project Search site that was lost due to COVID but has identified a new site to take its place.  Lost site was a hospital and new site is hospitality/service industry.  While ORS has not been able to expand the number of Project Search sites, ORS continues to explore that option. ORS has three transition age Project Search programs, 2 hospital-based programs and one professional office-based program.  This past school year ORS had an 88% employment rate over the three transition programs.
* ORS continued to partner with DLT/RealJobsRI initiative to identify new employment opportunities in emerging business sectors for individuals with disabilities.  The progress has been slow in this area because the focus has been on Consent Decree demands of the IDD population.  Discussions are ongoing.
* ORS BEST has participated in Chamber of Commerce events, job fairs, employer forums, and direct employer contact to assess the needs of the business community.
* ORS has had initial discussions to assist BEST to collaborate with other State agencies (including DLT and BHDDH) as per WIOA requirements to consider employers as another customer base of VR.  Strategy has not yet been developed.
* ORS has developed a draft version of an internal tracking tool to monitor employers/business contacts, industries, ORS liaison, and job board.  ORS has developed a Teams page for BEST activities including tracking tool.
* ORS identified increased employer penetration via annual report to WIOA/DLT/GWB reporting.  Information and Support Services was provided to 25 employers.  26 employers were provided Workforce Recruitment Assistance and 5 employers accessed untapped labor pools.
* ORS reintroduced application, IPE development and competitive integrated employment productivity goals for all VR counselor staff and decided against introducing productivity goals for BEST members only.

**GOAL 4: TO PROVIDE A FLEXIBLE SERVICE DELIVERY SYSTEM THAT HELPS INDIVIDUALS TO REMOVE PERSONAL AND OTHER BARRIERS THEY FACE TO OBTAIN AND MAINTAIN COMPETITIVE INTEGRATE EMPLOYMENT:**

ORS measured number of competitive integrated employment outcomes during PY showing an increase of 363 individuals due to an increase in individuals who were able to access more flexible services ORS provided.

**OBJECTIVE 1**: Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into competitive integrated employment.

* In-School Youth with Disabilities: ORS continued to outreach to 504 Coordinators.  ORS presented at the Annual Rhode Island Guidance Counselor Conference to talk about services and referrals.  ORS continued to expand services to the many school districts throughout the state.
* ORS continued to work with the Rhode Island Training School as well as having meetings with the Dept of Corrections to offer and coordinate services to those “at risk” youth exiting these programs.  ORS has continually reviewed and expanded its traditional Transition services to meet the needs of school districts.  This includes middle school students with the goal of introducing Pre-ETS services at an earlier age.  This has given students an earlier look at potential career interests and pathways as they enter high school.
* ORS collaborated with The Regional Transition Center, BHDDH, School Districts, and Adult Providers utilizing Griffin and Hammis in a Discovery School to Work pilot for more significantly disabled students to increase exposure to employment, improve employment outcomes, as well as providing a for seamless exit from school to adult life.  The challenge remains vendor capacity in providing customized employment. The Discovery School to Work pilot was completed and has created a best practice in coordinating services for students exiting high school and entering adult services.
* Adults with Disabilities: ORS has worked with the providers to identify obstacles to service delivery including a fee for service rate review and increase to ensure a wide array of service providers and training programs are available.  Several new vendors came on board to enable customers from underserved populations to participate in employment services.  ORS developed a relationship with LAZO which provides brokerage services for Individuals in the Hispanic community.  They provide employment services in addition to several other services that are aimed at helping the individual progress toward their goals and independence.
* ORS continued to review, design, and modify programs and services as changing needs of customers are identified.  An example would be changes to driving evaluations and instruction including instructors speaking multiple languages.
* ORS counselors have participated in CHARLA by LAZO for Spanish-speaking families meeting them in the community to connect them with resources and employment. Challenges have again occurred due to vendor capacity.
* ORS continued to fund benefits counselor time for benefits counseling forums and information sessions to identify beneficiaries of Social Security who may be an underserved or unserved population and who could benefit from connecting with ORS.
* ORS increased the fees paid for benefits counseling provided to those ORS customers on SSI/SSDI who may be unserved/underserved at key points in the employment path via collaborative efforts with the Sherlock Center WIPA program or ORS fee for service programming.  ORS also entered into an MOU with Work without Limits to enable referrals at time of case closure.

**OBJECTIVE 2**: Change the culture of Supported Employment (SE) vendors to expect that competitive integrated employment is the goal from services.

* ORS continued to meet with vendors quarterly to monitor quality services.   The changes in the fee structure came out of these quarterly reviews.  These meetings also identified areas of training needs for CRPs such on topics as Customized Employment, IPS and Braiding of Funds.  ORS worked with BHDDH and implemented training opportunities to improve services with an aim on best practice.
* ORS collaborated with BHDDH to conduct quarterly VR meetings with SE (DD and BH) vendors to reinforce and strengthen Employment First principles and practice.  Discussions at these meetings focused on service delivery, changes in services, sequencing funding, etc.  These meetings support and facilitate the SE Developmental Disability and SE Behavioral Health vendors to create opportunities for community of practice, creative problem-solving, information dissemination and training.
* ORS encouraged vendors to provide a full continuum of SE Services including Pre-ETS and worked with providers to explore impediments to service delivery and strategized solutions to overcome obstacles.  ORS also reviewed fee structure and increased fees for services for many services to allow for CRPs to have a more stable workforce and fiscal outlook.
* ORS explored Youth Build grants but were unable to take advantage of it as it was not offered in Rhode Island.

**OBJECTIVE 3**: Continue to explore ways to expand the Ticket to Work program and Employment Network capacity to ensure a continuum of available support and service delivery for clients who meet the Social Security Ticket Program eligibility.

* ORS continued to grow and learn of its development needs and identify gaps in service delivery and cost reimbursement.  Between 2021 and 2022 ORS had 2 staff turnovers in the primary position designated to cost reimbursement resulting in program stagnation, onboarding/length of suitability process concerns and full ability of newly hired staff to perform assigned duties.
* ORS met twice with a representative of the J Morrow Ticket Tracker with the second meeting including representation from our ECMS vendor and our IT department.  ORS continues to move in the direction of the “Ticket” tracker being aligned and available upon the implementation of the new ECMS, which was not onboarded when initially planned, thus delaying the onboarding of this resource.  The “Ticket Tracker” will provide increased ability to monitor cases for possible reimbursement, which is currently being done manually by designated staff.
* The development of Employment Network Partnerships within the State continues to be a challenge.  ORS enlisted Maximus the previous ticket EN manager to present to ORS Community Rehabilitation Programs on the benefits of becoming an EN.  Unfortunately, despite three presentations between 2021 and 2022 and additional resource notifications, CRPs due to resource concerns, staffing concerns, etc. currently did not feel the return on investment of establishing themselves as an Employment Network was beneficial to them.   ORS will continue to assess interest and re-visit this at a future time.
* In 2022 ORS and University of Massachusetts/UMASS Chan Medical School, Work Without Limits developed an MOU to enable client continuum of support/service at time of closure with ORS.  Staff were provided a presentation on the benefits of working with WWL and referral process.  Additionally, this relationship provides staff and clients access to a monthly “Ticket Tuesday” training topic.
* ORS continues to provide TTW information to staff of the agency on topics such as the TTW program requirements, Work Incentives Planning and Assistance: Introduction to SSD Benefits, Work Incentives and Employment Support Programs with six staff attending, Sherlock Center WIPA program presented to all staff in 2021 and provide ongoing notification to staff of monthly SSI/SSDI Work Incentive presentations for adults and youth, etc.  In 2022, ORS developed a Participant Guide – Ticket to Work, clarified language on the IPE signature form regarding TTW/In-Use status and sends a final closure letter to ensure clients In-use with ORS at time of closure are aware of the “Ticket” being taken out of use and available support options.  In 2023 ORS began recognizing staff for employment outcomes meeting Substantial Gainful Employment and case documentation leading to a cost reimbursement with a “Cost Reimbursement Star”.
* While still a consideration, ORS has not moved forward with development of an SSA TTW internal liaison team.  Had ORS efforts to establish one or more EN’s within the state this would have been a priority. Also, the SSA TTW and VRC vacancies have presented resource challenges.  Additionally, a focus on enhancing re-establishing caseloads, client relationships and vendor relationships post Covid was a primary focus.
* Benefits Counseling continues to be available on a fee-for-service basis via VRC and client agreeing on the service in the IPE and a referral to one of the five ORS approved vendors.  Additionally, clients have access to the Sherlock Center WIPA presentations on Work Incentives for those on SSI/SSDI.  Individuals, referred to Work Without Limits for ongoing support at time of closure also have access to benefits planning via WWL benefits planning resources.

**GOAL 5: DEVELOP DATA COLLECTION AND REPORTING METHODS THAT MEET THE COMMON WIOA PERFORMANCE MEASURES AND RSA STANDARDS OF PRACTICE AS EVIDENCED BY AGENCY ABILITY TO MEET REPORTING AND STATUS CHANGE EXPECTATIONS OF RSA.**

ORS monitored this goal through staff training and ongoing refinement of data collection, data entry, and reporting with new case management system.

**OBJECTIVE 1**: Meet WIOA performance accountability measures.

* ORS continued to work with ECMS to track performance measures and RSA standards.  As of this date, new ECMS is still in development.  ORS will still need to ensure that it encompasses the requirements for WIOA measures and data reporting.
* ORS continued contributing reporting data elements as required to the Department of Labor and Training/lead WIOA partner in the state.
* The internal System 7 group continued to educate staff to the required WIOA data elements and established numerical targets that are required importance of timely and accurate documentation.  ORS provided one-on-one meetings with VRCs and Data Collection Quality Control Specialist to discuss WIOA documentation and data entry correction.
* ORS is participating in a three-year pilot, funded through the TRT grant with the University of Utah, to measure effectiveness of Pre-ETS services.  ORS has developed a draft reporting system which shows the increase/utilization of Pre-ETS services from year to year.
* ORS will continue to explore Technical Assistance opportunities on capturing performance measures as needed.
* Quarterly ORS continued to review RSA911 data and Dashboard data with QI Committee and VR Supervisors.  This has led to trainings such as Case Documentation, target case reviews, VRC one-on-one re-orientation to data documentation, etc.
* ORS implemented SE youth tracking in ECMS to distinguish distribution of funds between you and adults.

**OBJECTIVE 2**: Meet the statutory requirements under the Rehabilitation Act and the implementing regulations.

* ORS continued to reinforce VR counselors to determine eligibility within 60 days of application and to develop the Individualized Plan for Employment (IPE) within 90 days of eligibility determination.  Staff continues to struggle with the proper data entry for extensions.
* ORS also had a waitlist for services for several years, instilling caution in counselors from rapidly making their clients eligible.
* ORS Supervisors were not able to access the ECMS/MIS dashboard to view their regional staff to track adherence to these standards on a quarterly basis. ORS Supervisors and Administrator developed individual performance targets for staff to aim for but did not include 60-day and 90-day compliance.

**OBJECTIVE 3**:  Utilize available agency data through the Quality Improvement process to enhance and support program development, staff and vendor training and services to customers.

* ORS reviewed the current regulations and procedures to ensure alignment with current business practices, RSA and WIOA directives, and quality service delivery.
* ORS continued to review WIOA data contained in the RSA-911 and RSA Dashboard at QI meetings and information is relayed to supervisors.  Findings have led to staff training on ECF documentation, review of procedures, case review focus areas, one to one staff training, enhanced data entry monitoring for completeness and correctness, etc.
* ORS enlisted support and assistance from SRC with policies, regulations, annual report, consumer satisfaction reports.
* ORS continued monthly customer satisfaction surveys.
* ORS continued quarterly case reviews.

**OBJECTIVE 4**:  Provide agency staff with up-to-date tools and technology that enhance delivery of services to customers and capture reportable data.

* ORS staff were provided a self-paced introduction based on role access to the new Case Management/MIS System.  Pending the full onboarding of staff will be provided additional training as relevant to their role in the agency and access into the system.
* ORS has purchased Chromebooks and the Career Scope in English and Spanish for the seven regions.  VRCs received training in the implementation of the Career Scope and interpretation of the results.  Staff will be able to access Virtual Job Shadow platform on these Chromebooks as well. ORS continues to utilize the Virtual Shadow Program, Pathful, with clients to help with job exploration.  ORS has also offered the use of the Program to CRPs, and they have been provided with user IDs and passwords to be able to use it with their customers.
* Utilization of the wage interface tool developed with the ECMS vendor to report RI UI wage data enabled ORS to more accurately capture and report WIOA post exit wages.  ORS had hoped to explore the ability to do the same with the SWIS wage data, however this remains pending the onboarding of the new case management system InFormed.  Access and utilization of The Work Number remains a wage data search tool as well.
* ORS has met twice with a representative of the J Morrow Ticket Tracker with the second meeting including representation from our ECMS vendor and our IT department.  ORS continues to move in the direction of the “Ticket” tracker being aligned and available upon the implementation of the new ECMS/InFormed, which was not onboarded when initially planned, thus delaying the onboarding of this resource.  The “Ticket Tracker” will provide increased ability to monitor cases for possible reimbursement, which is currently being done manually by designated staff.
* Via a variety of training platforms, all staff have benefited from and continue to be supported and encouraged to engage in relevant training that enhances their skill set in the use of various electronic tools and platforms.  This has ranged from basic Word, Excel, and PowerPoint trainings to Career Interest tools such as Career Scope and the new ECMS.

##### 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

**WIOA Performance Accountability – PY22**

Data was obtained from the PY22 WIOA RSA performance assessment results.

|  | Negotiated Level | Adjustment Factor | Adjusted Level | Actual Level | Performance Assessment (Actual Level/Adjusted Level) |
| --- | --- | --- | --- | --- | --- |
| Measurable Skills Gains Rate | N/A | N/A | N/A | N/A | N/A |
| Employment Rate – 2nd Quarter After Exit | 46.1% | 2.4% | 48.5% | 46.6% | 96.1% |
| Median Earnings – 2nd Quarter After Exit | $3,385 | -$22 | $3,363 | $3,481 | 103.5% |
| Employment Rate – 4th Quarter After Exit | 45.3% | 2.6% | 47.9% | 43.1% | 90.1% |
| Credential Attainment Rate | 37.5% | 7.3% | 44.8% | 33.6% | 75.0% |

Upon review of data, it appears that ORS met all goals.

##### 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).

* ORS utilized I & E funds to support and augment the benefits counseling outreach provided by the Sherlock Center on Disabilities WIPA project.
* ORS utilized I & E funds to support the Rhode Island College Paul V. Sherlock Center on Disabilities facilitation of the Developmental Disability and Behavioral Health Supported Employment Council meetings, including joint quarterly meetings to enhance the Supported Employment  services provided to individuals who require them.  The quarterly meetings provide education and resources to Supported Employment CRP providers of services, clients and families/support systems.
* ORS utilized I& E funds to support the activities of the SRC.

#### 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.

##### 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.

ORS has elected to carryover many of the goals because of Consent Decree demands, staff vacancies, provider capacity issues, and post pandemic climate.  Supported Employment services are provided after placement and Title I funds are used prior to placement for those seeking supported employment outcomes.    ORS continues to fund and sponsor ongoing training and technical assistance to the supported employment CRPs. Training on supported employment regulations, policy, core values, and best practice has occurred with staff of ORS and with CRPs to increase participation in provision of the ORS Supported Employment program. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs to provide the extended supports that sustain employment for individuals with significant disabilities.

The Rhode Island Office of Rehabilitation Services’ (ORS) goals and priorities, policies, and planning activities for PY2024 through PY2027 are jointly agreed upon by the state agency and the State Rehabilitation Council (SRC). These goals are generated from the Statewide Comprehensive Needs Assessment (CNA), compliance with RSA practice standards, as stated in WIOA, monitoring reviews, the Department of Justice (DOJ) State Consent Decree and Interim Settlement Agreement, quality improvement findings, and feedback from customers, advocates, and other stakeholders. Inherent in these goals is the belief that ORS will assist individuals with significant disabilities to move toward achievement of vocational goals, career development, and increased self-sufficiency.

**GOAL 1: TO INCREASE AWARENESS OF ORS AND ITS SCOPE OF SERVICES FOR SUPPORTED EMPLOYMENT:**

**OBJECTIVE 1**:  In order to increase awareness of ORS’s supported employment program, ORS will participate as active members in community forums, employer/job fairs, regional Chamber of Commerce meetings, Statewide Human Resource Management events, DD and MH SEC meetings, and Transition events.  Information about the availability of supported employment services will be presented in this manner:

* Collaborate with Regional Transition Centers and BHDDH to present on Introduction to State Services to ensure consistent messaging occurs for schools, LEAs, and families on availability and scope of ORS supported employment services.
* Collaborate with Sherlock Center, BHDDH on facilitation of BH and DD Supported Employment Council meetings to increase knowledge base of providers and CRPs who offer SE.
* Identify the training needs of Supported Employment Providers to enhance skill development.
* Explore technical assistance from VRTAC-QM on how better to market the availability of ORS supported employment services to the public.
* ORS will continue to identify and create vendors and services for the service needs of SE Transition individuals.
* Develop some video presentations regarding supported employment and customized employment, and post on ORS website.
* Present on ORS supported employment services at Developmental Disabilities Council meetings, Rhode Island Chapter of the Association for People Supporting Employment First (RIAPSE), The Sherlock Center and Rhode Island Rehabilitation Association (RIRA) events.
* Collaborate with BHDDH and Sherlock Center to facilitate two Vendor Fairs to increase engagement with businesses and increase awareness of the availability of supported employment services to employers.    First fair to be held virtually in PY 2021 and a follow up face-to-face fair in PY 2022. The fair will be an opportunity for the CRP’s who provide SE services, ORS counselors, BHDDH social workers and self-directed individuals to increase awareness of the scope of supported employment services that ORS has available, and for employers, raise the awareness to those CRPs that provide SE services in the areas they are in and what specific services those CRPs and ORS can currently offer.
* ORS will continue to expand SE services to youth prior to exiting high school, as directed in the most recent court actions under the Consent Decree, to secure employment prior to exit and in the process are facilitating an early introduction to adult providers.

**OBJECTIVE 2**: Utilize participation on Governor’s Workforce Board, Workforce Investment Boards, and other advisory groups to help increase awareness of the supported employment services that ORS can provide and utilize the ORS BEST team to gather current information about business sector needs and state responses.

The goal is to increase the awareness of what Supported Employment services are needed and what is available, and to:

* Establish a system to disseminate information to VR Counselors whose focus is on individuals who require SE services.
* Encourage WIOA partners to include requirements that target individuals with disabilities in their hiring initiatives.
* Explore opportunities with all State Partners for collaborative and sequenced funding models for supported employment service delivery via TA from VRTAC-QM.
* Create and implement programs for I/DD youth to participate and gain exposure to career and technical education.

**OBJECTIVE 3**: Develop, implement, and replicate the successful business partnerships already operating.

* Implement, coordinate, and expand on Project Search sites to offer opportunities for internships and job exploration for adults and students with IDD and who need supported employment services.
* Create and implement program for IDD youth to participate and gain exposure to career and technical education.
* Partner with emerging, high wage business sectors and DLT/ RealJobsRI initiative to identify new employment opportunities for individuals with disabilities who need supported employment services.

**GOAL 2: INCREASE SERVICES TO UNDERSERVED AND UNSERVED POPULATIONS:**

**OBJECTIVE 1**: Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into competitive integrated employment.

* In-School Youth with Disabilities: enhance and expand the Transition program and service options for students and youth who need supported employment services to coordinate and deliver options for work experiences to youth who will require supported employment services.
* Adults with Disabilities who require supported employment services: ensure a wide array of supported employment service providers and training programs are available to enable individuals who need supported employment services for them to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.
* Design and modify programs and services as changing needs of customers are identified.

**GOAL 3: TO PROVIDE A FLEXIBLE SERVICE DELIVERY SYSTEM THAT HELPS INDIVIDUALS TO REMOVE PERSONAL AND OTHER BARRIERS THEY FACE TO OBTAIN AND MAINTAIN COMPETITIVE INTEGRATE EMPLOYMENT:**

**OBJECTIVE 1**: Establish an array of SE services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities who require SE services, engages unserved and underserved individuals, and moves individuals who need supported employment services into competitive integrated employment.

* In-School Youth with Disabilities: enhance and expand the Transition program and awareness of SE service options to coordinate and deliver those services to provide work experiences to youth who require SE services.
* Adults with Disabilities: ensure a wide array of supported employment service providers and training programs are available to enable individuals who need supported employment services to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.
* Design and modify programs and services as changing needs of customers are identified.

**OBJECTIVE 2**: Change the culture of Supported Employment (SE) vendors to expect that competitive integrated employment is the goal from services.

* Identify areas of training needs for CRPs and implement training opportunities to improve services with an aim on best practice.
* Conduct quarterly VR meetings with SE (DD and BH) vendors to reinforce and strengthen Employment First principles and practice.
* Support, facilitate, and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings to create opportunities for community of practice, creative problem-solving, information dissemination and training.
* Encourage vendors to provide a full continuum of SE Services and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of full continuum of services.
* Examine and modify, as needed, the VR fee structure to ensure it rewards integrated employment outcomes.
* Identify ways that Virtual Service delivery can optimize services to individuals who are unserved or underserved.
* Encourage CRPs to identify transportation barriers prior to locating employment opportunities to ensure long term job capabilities and retention.
* Provide training and technical assistance via VRTAC-QM on models such as the Integrated Resource Teams (IRT) to enhance wraparound services based on an individual’s need and helps to meet their employment goal.

**GOAL 4: DEVELOP DATA COLLECTION AND REPORTING METHODS THAT MEET THE COMMON WIOA PERFORMANCE MEASURES AND RSA STANDARDS OF PRACTICE FOR SUPPORTED EMPLOYMENT (SE) AS EVIDENCED BY AGENCY ABILITY TO MEET REPORTING STANDARDS.**

**OBJECTIVE 1**: Meet WIOA performance accountability measures for Supported Employment (SE).

* Determine the “what and how” of contributing ORS SE data to state reporting requirements and cooperating with State-wide partners of data sharing agreements.
* Continue to educate staff to the new data elements for SE that are required and need to be maintained, be timely, and accurate.
* Continue to participate in Technical Assistance opportunities on capturing performance measures.

**OBJECTIVE 2**:   Provide agency staff with up-to-date tools and technology that enhance delivery of SE services to customers and capture reportable data.

* Provide Staff Training and support as the agency transitions to new Electronic Case Management/MIS System.
* Work with BHDDH and CRPs to track employment outcomes as required by DOJ Consent Decree.

##### 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.

The Rhode Island Office of Rehabilitation Services (ORS) continues to provide supported employment services to enable individuals with the most significant disabilities to have access to integrated competitive employment opportunities.  ORS has maintained involvement with two (Behavioral Health (BH) and Developmental Disabilities (DD)) Supported Employment (SE) Advisory Councils, representation on the Developmental Disabilities Council, and the RI Transition Council. WIOA expands SE services to students with disabilities and obligates ORS to set aside 50% of its Title VI funds (when appropriated) for youth with the most significant disabilities.

ORS will continue to partner with Community Rehabilitation Providers (CRPs) of supported employment services so that customers can make informed choices about integrated competitive employment options through real work experiences.  The timeframe for transitioning an individual from supported employment services to extended services is based upon the individual needs of each consumer. ORS may fund up to 24 months of supported employment services to individuals with the most significant disabilities following placement on the job, if no long-term provider funding is available through BHDDH or any other sources. Including the provision of up to 24 months of supported employment services, ORS may provide up to four years of extended services to youth up to age 25; however, ORS may not provide extended services to anyone other than these youth, which must be provided by CRPs or other sources.  These long-term supports could and should include natural supports from the employer or others.

ORS will continue to encourage CRPs to collaborate with each other, through a quarterly meeting sponsored by ORS through the BH and DD SE Councils with BHDDH representation, to meet the diverse employment needs of individuals who are significantly disabled with intellectual and behavioral health issues. This collaboration is also encouraged at individual and joint meetings of the Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH), Divisions of DD and BH Supported Employment Councils. Some ORS customers not eligible for the long term supports provided by DD or BH agencies have significant functional limitations and could benefit from the supports and job coaching expertise of SE agencies, with an overall goal of increasing integrated, competitive employment outcomes.  ORS is continuing to work with staff and vendors on improving the quality of the jobs, salary, and benefits for customers receiving supported employment services.  Again, these supports could and should include natural supports if available.

The State of RI negotiated a 2014 Consent Decree (CD) and Interim Settlement Agreement (ISA) with the Department of Justice (DOJ) to ensure that Employment First principles and practices are utilized in planning and service delivery to adults, in-school youth, and out-school youth with significant intellectual disabilities (I/DD) who need access to the continuum of VR  Services, including of Supported Employment Services in order to work.   BHDDH, RIDE and ORS are working closely on all facets of the Consent Decree to ensure youth and adults with IDD or those identified as covered under the Consent Decree have access to varied SE services and experiences in their interest area and the supports needed for CIE.

CRP development will continue to meet the needs of all ORS adult, out-of-school youth, and in-school youth eligible for Supported Employment services and expand on CRP access to funding source options such as benefits of becoming a Ticket to Work employment network, Partnership Plus, and Department of Labor and Training/Governor’s Workforce Board through identification of new CRPs and enhancing current CRPs.

As a result of the Pandemic, ORS collaborated with the CRP’s to immediately address how to ensure services did not lapse.  As a result, ORS developed an array of Virtual Services for SE to ensure that individuals requiring SE would continue to receive vocational services.   This array of virtual services produced successful results in keeping individuals engaged in services and to assist them in moving forward towards their vocational goals and it was determined that the virtual services will remain available on a hybrid basis and will be utilized for individuals who are not able to participate in face-to-face services due to health reasons, transportation issues, lack of CRP capacity in certain geographical regions or disability-related issues.  ORS has found that having this hybrid model has allowed for increased efficiency for services, especially on a group basis; individualized services, however, have also been seen as productive, especially when face to face supported employment services were not available.

*The timing of transition to extended services*

ORS, as a partner and funding source of Supported Employment services, engages CRPs to provide the extended supports that help sustain employment for individuals with significant disabilities. Long-term supports, generally funded by Behavioral Health, Developmental Disability and Hospitals (BHDDH), are planned for, and included in the ORS customers’ Individualized Plan for Employment (IPE). Supported Employment services are provided after placement and Title I funds are used prior to placement for those seeking supported employment outcomes.  The IPE is based on the needs of the customer and define the scope, specific services, and duration of ORS-funded SE services. ORS, according to the Rehabilitation Act amended by WIOA, can fund SE services to 24 months for all individuals, and ORS will provide Supported Employment services to youth with the most significant disabilities, including ORS funded extended services for youth in accordance with the requirements set forth in 34 CRF prt361 and part 363 for a period not to exceed four years or at such time that a youth reaches age 25 and no longer meets the definition of a youth with a disability, whichever comes first. Natural supports from the employer or others can and should be identified and utilized as available.

The IPE identifies the CRP that accepts responsibility for providing the long-term and intermittent support services, funded by BHDDH, in order to maintain employment. This shift in service-delivery responsibility is well coordinated by the ORS counselor and vendor agency staff, so that there will be a seamless and continuous delivery of job retention services to the individual. The transitioning of a customer from the support services provided by both ORS and the CRP to the supports are provided solely by the CRP.  Again, natural supports from the employer or others can and should be identified and utilized as available.

ORS Transition Counselors assist students and families to identify the CRP that will accept responsibility for providing core support services including extended supports for youth with disabilities aged 14 up until the age of 25 with the most significant disabilities.  This shift in service-delivery responsibility is well coordinated by the ORS counselor and vendor agency staff, so that there will be a seamless and continuous delivery of job retention services to the individual, including referrals to BHDDH and or other natural supports that may be available, as stated above.

##### 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 C.F.R. § 363.4(a) and 34 C.F.R. § 361.5(c)(19)(v).

The Rhode Island Office of Rehabilitation Services (ORS) continues to provide Supported Employment services, requirements of WIOA, RSA, and the RI Department of Justice/State Consent Decree (DOJ/CD), as a means to enable individuals with the most significant disabilities to have access to the supports needed to participate in integrated competitive employment opportunities. ORS has maintained involvement with two Supported Employment (SE) Advisory Councils for Developmental Disabilities and Behavioral Health, representation on the Developmental Disabilities (DD) Council, RI Association of People Supporting Employment First (RIAPSE), and the RI Transition Council.

ORS participates on multiple committees, task groups, and in various arenas to discuss employment expectations with customers, providers, and families. ORS is committed to providing and improving Supported Employment services to ORS customers. For those customers who meet the supported employment criteria, the Individualized Plan for Employment (IPE) becomes the foundation for meeting their individualized supported employment needs. The IPE defines the employment goal, the timeline, services, and long-term support provider/vendor who will continue to provide support to the individual with a disability on a long-term basis. These long-term support providers/vendors are identified in an agreement of understanding, signed by the vendor agency and ORS.

**SUPPORTED EMPLOYMENT SERVICE DELIVERY**:

ORS has employment services that are available to adults, youth, and students with disabilities found eligible for VR Services who need intensive supported employment services, and extended services after the transition from support provided by ORS in order to perform work. The values and principles of ORS to make integrated competitive employment available to all individuals with disabilities has been reinforced by a State of RI DOJ/State Consent Decree. The Consent Decree (CD) and Interim Settlement Agreement (ISA), between RI and DOJ, resulted in a Governor’s proclamation declaring that RI is an Employment First state. The principles and practices of Employment First, consistent with the mission of ORS and the mandate of the Rehabilitation Service Administration (RSA), are utilized in planning and service delivery to adults, in-school youth, and out-of-school youth.

The DOJ/State Consent Decree requires three state agencies: (1) Office of Rehabilitation Services (ORS), (2) the Rhode Island Department of Education (RIDE) and (3) the Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to develop and implement a service-delivery system that ensures individuals, adults and youth, have access to the services and supports that lead to integrated competitive employment opportunities as the first and desired outcome of state funded services.  Provider staff resources were therefore unavailable to support integrated competitive employment efforts for adults, youth, and students with significant behavioral health and developmental disabilities. ORS and BHDDH, two of the parties of the DOJ/State Consent Decree are mandated to create a state-wide Supported Employment service-delivery system that ensures adults and youth with I/DD are afforded full access to Supported Employment services and long-term supports to maintain employment. There has been a significant increase in collaboration among the State Agencies and the provider network on how best to develop this systems’ change.

The three state entities continue to refine and utilize a Transition timeline for staff, families, and school personnel to clarify each agency’s obligations to implement the DOJ/State Consent Decree requirements for in-school youths’ access to employment exploration and work experiences. An annual “Introduction to State Services” meeting with each high school, continues to be held.

ORS recently signed a Cooperative Agreement with RIDE, which extended the previous agreement and lays out joint and separate responsibilities of each party. ORS has maintained a very robust presence at each high school in the state to assist with and provide transition-related services for over 20 years. The ORS Rehabilitation Counselor functions as a liaison, consultant, and referral source to the transition personnel of each high school in the state. ORS has been providing a wide array of transition services since the inception of the Cooperative Agreement to in-school youth with disabilities, including youth with I/DD.  The array of ORS transition services via Pre-ETS and other related transition programming is in place for both students and youth with disabilities and those youth eligible for Supported Employment services that meet the requirements of WIOA and the DOJ/State Consent Decree.

**SUPPORTED EMPLOYMENT AGENCY NETWORK**:

ORS has a long-standing history of collaboration with the RI agency responsible for services to individuals with developmental and behavioral health disabilities - Behavioral Health, Developmental Disabilities and Hospitals (BHDDH). ORS funds an array of Supported Employment services for adults and youth with developmental and behavioral health disabilities through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRPs). Many of these Supported Employment (SE) CRPs are also licensed by BHDDH to provide residential, case management, and support services to individuals with developmental and behavioral disabilities.

ORS has a referral, liaison, and consultative relationship with the CRPs. ORS funds a continuum of Supported Employment services through the customer-selected CRP. These services are provided after placement with Title I funds being used prior to the placement for those seeking supported employment outcomes. The objective of the SE services is to support and individual in maintaining an integrated competitive employment outcome paid at or above minimum wage. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs who also rely on BHDDH funding to provide the long-term supports that help sustain employment. Long-term supports are planned for and included in the customer’s ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and specific Supported Employment service. WIOA/RSA funding for SE services is limited by several considerations: services will be available for (individuals with the most significant disabilities found eligible for VR services and who need intensive supported employment services, and extended services after the transition from support provided by ORS in order to perform work,  and a limitation of supported employment services up to 24 months, or for up to 48 months of extended services (after supported employment services) for youth until age 25 if no other funding source is available.  Natural supports can and should be explored when available.

The IPE also identifies the CRP that is accepting responsibility for long-term and intermittent support services to the individual with a disability. The time frame for transitioning an individual from supported employment services to extended services is based upon the individual needs of each consumer. ORS may fund up to 24 months of supported employment services to individuals with the most significant disabilities following placement on the job. ORS may provide up to four years of extended SE services to youth up to age 25; however, ORS may not provide these extended services to anyone other than youth, and those supports must be provided by CRPs or other sources. In addition, natural supports can and should be explored when available.

ORS has been working with CRPs who provide Supported Employment services to improve the quality and availability of employment-related services.  Due to the complexities of implementation of the DOJ/State Consent Decree, ORS facilitates a quarterly meeting with all the I/DD Supported Employment CRPs. Those meetings focus on service delivery, increasing hours/week as an expectation of a successful employment goal, and to offer support and guidance to the providers.

ORS took the lead to ensure that staff have the expertise appropriate for the vocational services being provided to individuals with disabilities. ORS has been working with the Sherlock Center for Disabilities, and NCISI to identify, develop, plan, and execute training for employees of ORS-approved provider networks. Attending to the training needs of CRPs is an ongoing commitment for ORS. The Assistant Administrator for Vendor Affairs/Workforce Development and Supported Employment meet at least quarterly with providers/vendors who provide Supported Employment (SE) services to re-enforce the philosophy of Employment First. The two Assistant Administrators, in collaboration with field supervisors, counselors, and ORS administrators, are actively involved in meetings with potential vendors to discuss becoming a Supported Employment vendor; the hope is that this will increase service delivery capacity. These meetings with CRPs provide an opportunity to address concerns and questions as well as clarify the elements of a quality employment outcome. ORS participates in a DD/BH combined Supported Employment Advisory Council as a means of dedicating resources and reinforcing a commitment to integrated competitive employment for individuals with significant disabilities.  These meetings are facilitated by Sherlock Center and BHDDH is an active participant.

ORS will continue to encourage CRPs to collaborate with each other, through regular meetings sponsored by either BHDDH or ORS, to meet the diverse employment needs of significantly disabled individuals with intellectual, developmental, and behavioral health issues. This collaboration is also encouraged at joint meetings of the BHDDH, Divisions of DD and BH Supported Employment Councils. Some ORS customers not eligible for the long-term supports provided by DD or BH agencies have significant functional limitations and could benefit from the supports and job coaching expertise of SE agencies, with an overall goal of increasing integrated, competitive employment outcomes. SE customers have increased the average number of hours employed; however, ORS is continuing to work with staff and vendors on improving the quality of the jobs, salary, and benefits for its’ supported employment population. The fee for service model continues to be updated and modified to cover needs of the SE customer.

As a result of the Pandemic, ORS collaborated with the CRP’s to immediately address how to ensure services did not lapse.  As a result, ORS developed an array of Virtual Services for SE to ensure that individuals requiring SE would continue to receive vocational services.   This array of virtual services produced successful results in keeping individuals engaged in services and to assist them in moving forward towards their vocational goals and it was determined that the virtual services will remain available on a hybrid basis and will be utilized for individuals who are not able to participate in face-to-face services due to health reasons, transportation issues, lack of CRP capacity in certain geographical regions or disability-related issues.  ORS has found that having this hybrid model has allowed for increased efficiency for services, especially on a group basis; individualized services, however, have also been seen as productive, especially when face to face supported employment services were not available.

#### 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 C.F.R. § 361.29(b), annual estimates must include the following projections:

##### 1. Estimates for next Federal fiscal year—

###### A. VR Program; and

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| 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) |
| --- | --- | --- | --- | --- |
| 1 (Individuals with Most Significant Disabilities) | 811 | 811 | $704,674.47 | N/A |
| 2 (Individuals with Significant Disabilities) | 406 | 406 | $787,995.39 | N/A |
| 3 (All Other Eligible Individuals) | 45 | 45 | $84,512.70 | N/A |
|  |  |  |  |  |

###### B. Supported Employment Program.

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| Priority 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) |
| --- | --- | --- | --- | --- |
| 1 (Individuals with Most Significant Disability) | 518 | 518 | $1,835,301.98 | N/A |

#### g. Order of Selection

##### 1. 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.

\*  VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

The VR agency is not implementing an order of selection and all eligible individuals will be served.

##### 2. For VR agencies that have defined priority categories describe—

###### A. The justification for the order

N/A

###### 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

Based on a functional assessment in each of the seven areas of life functioning, eligible individuals are assessed according to the significance of their disability, as defined in the Rehabilitation Act, section 7(21)(A): ...the term "individual with a significant disability" means an individual with a disability (i) who has a severe physical or mental impairment which seriously limits one or more functional capacities (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome;(ii) whose vocational rehabilitation can be expected to require multiple services over an extended period of time; and(iii) who has one or more physical or mental disabilities resulting from [list] ... or another disability ... to cause comparable substantial functional limitations.”

**First priority** will be given to consumers with the most significant disabilities or consumers classified in the Order of Selection as Category I. This category refers to a consumer who has a most significant disability, whether a mental or physical impairment, that seriously limits four or more functional capacities in terms of an employment outcome and whose vocational rehabilitation requires multiple services over an extended period of time.

**Second priority** will be given to consumers with significant disabilities. A consumer has a significant disability if a mental or physical impairment exists that seriously limits one or more functional limitations capacities in terms of an employment outcome and whose vocational rehabilitation requires multiple services over an extended period of time.

**Third priority** will be given to other eligible consumers who have a disability, whether a mental or physical impairment, that seriously limits one functional capacity in terms of an employment outcome and requires one or more services over an extended period of time.

**Extended period of time**: Six months or more.

**Multiple services**: Requiring two or more  services.

###### 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.

**ORS has all categories open, and this section is N/A.**

##### 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?

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 C.F.R. § 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 C.F.R. § 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate “not applicable.”

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 State 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 of personnel currently needed by the VR agency to provide VR services, broken down by personnel category; and

###### B. 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;

###### 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.

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| Personnel Category | No. of Personnel Employed | No. of Personnel Currently Needed | Projected No. of Personnel Needed in 5 Years |
| --- | --- | --- | --- |
| VRC1 | 17 | 24 | 27 |
| VRC2 | 18 | 18 | 24 |
| Supervisory | 8 | 9 | 10 |
| Administrative | 8 | 8 | 8 |
| Fiscal | 6 | 6 | 9 |
| Support Staff | 11 | 11 | 15 |
| Social Services | 7 | 7 | 10 |
| Direct Services | 4 | 5 | 7 |
|  |  |  |  |

###### D. Ratio of qualified VR counselors to clients:

1. Ratio of qualified VR counselors to clients: 1: 78

###### E. Projected number of individuals to be served in 5 years:

Projected number of individuals to be served in 5 years:

PY 2028: 2,720

##### 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.

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Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open [this link to the blank table](file:///C:\node\578516). You can copy and paste the table into the narrative field, and start over if needed.

| Institute of Higher Education | Type of Program | No. of Students Enrolled | No. of Prior Year Graduates |
| --- | --- | --- | --- |
| Salve University | Master’s in Rehabilitation Counseling | 2 in full-time program; 0 in accelerated program | 0 |

###### 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.

* ORS has ongoing communication with Assumption College, Salve Regina University and UMass Boston to ensure that the present and projected needs of ORS are considered in the program planning. All offer a MA, or MS in Rehabilitation Counseling via a combination of on-campus and distance learning.
* ORS VR Administrator and Supervisors work with the schools to provide opportunities for students to meet with ORS to learn about Vocational Rehabilitation Services in the State VR agency, to promote the opportunity of paid practicum and internship opportunities, and the application process for posted positions as available.
* Additionally, ORS maintains a recruitment list and sends position posting and internship opportunities to education institutions in the Northeast and interested individuals.
* ORS VR Administrator and regional VR Supervisors meet annually in the Spring with VR students, recent alumni, and staff of Salve Regina University, Assumption College, and UMASS Boston to inform graduates of upcoming positions to be posted as well as educating attendees on the benefits of working for a State VR agency.
* Additionally, ORS will continue throughout the year to send reminders of internship availability and position openings.  Supervisors and VRCs reach out to, present at, and attend career days at local educational institutions who offer related human services degrees on the benefits of a career path, internships via the State of RI Internship Program, etc. in Human Services/Vocational Rehabilitation and working for a VR agency.      Despite an ongoing recruitment effort by ORS, many of the students in these programs attend classes virtually and reside scattered throughout the country, which lowers the number of candidates for internships and employment opportunities.

###### 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.

A.  Professional Development

* Professional Development requests are granted based on the direct benefit to the mission of the organization, availability of funding and slots and Supervisory consideration of workload requirements, coverage needs, and status of job requirements as related to the training.
* Staff attending trainings understand that they may be asked to present materials/ information to agency staff via All Staff Meeting and/or Regional/Unit Meetings.  Materials and resources will be reviewed with/given to Regional/Unit Supervisors.
* A Professional Development budget will be set each FFY for each Region/Unit and is monitored by the supervisor of the Region/Unit.  Fiscal will assist with identifying annual budgeted amount set aside for this purpose.
* Professional Development requests that are above the allotted FFY budget per staff will require approval from the respective VR/SBVI Administrator(s).
* Professional Development request can only be paid by ORS/State of RI to approved vendors. It is incumbent on staff requesting to attend the training/conference and/or staff sending out the training/conference to ensure the entity receiving payment is a vendor who accepts authorizations and will invoice the agency.  For electronic registration processes the ability to register and pay by invoice may also be a factor in that hinders the agency’s ability to approve the request.
* Due to the growing complexities of registration and payment processes for trainings, Incomplete Professional Development requests and/or requests submitted with less than a two-week lead time of the training registration deadline may not be honored.
* 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."

B.            ORS supports and encourages staff training and professional development and maintains a procedural process for individual staff request.  Additionally, ORS provides each staff with a monetary amount for their use in attending individual and/or professional development trainings that they and/or their supervisor see as professional development and skill enhancement.  ORS conducts a by-annual Comprehensive Staff Training Needs Assessment with the most recent one being completed in May of 2023.  The survey focused on staff training needs, professional development needs and training that would benefit both ORS and vendors.  The results of this assessment assist in ORS with the prioritization of training needs as an agency and/or individually.

* The agency also sees training as a dynamic process and introduces training topics on an ongoing basis based on data trends, changing needs of or the clients served, etc.
* Staff indicated the following topics as the top ten (10) training needs: Mental Health Diagnosis, Causes, and Supports; Social and Emotional Needs, Understanding Cognitive & Psychological Assessments; Hands on Training for InFormed/ECMS; Core VRC Skills, Assessment, Job Analysis, Interviewing Skills, Client Engagement and Communication; Business Engagement/Job Development for Job Ready Clients; Using Outlook. Word, Excel, Photo Shop, etc.; Gender Inclusivity, LGBTQ+ Issues in the Workplace and Employers; VR Regulations and Procedures, Sharing Information with Disability Rights Rhode Island; Transition; Disability Specific Trainings; Documentation Uniformity in Electronic Case File, Professional Writing.
* How ORS might assist staff with Professional Development reflected the following: Continue to provide trainings, monetary and time support to attend trainings; Provide opportunities for cross departmental job shadowing/exploration of duties and informational, meetings with experienced staff i.e., Pre-ETS and Supported Employment; Continue to maintain CRCC credit availability, offer trainings as varying times, recoded trainings with CRCC credits. Through supervision and opportunities to check in with other staff.
* ORS staff indicated the following as training that would benefit both ORS and Vendors of ORS; Employer Outreach, Business Engagement, and Worksite Development and Placement Skills with Creative Strategies and Accommodations in the Workplace; How to Improve Collaboration and Communication; Effective Partnership/Teamwork between Counselors, Vendors and Clients; Gender Inclusive Training, LGBTQ+; How to Properly Fill out Reporting Forms; Report Writing/Goal of Referrals and Assessments, How to Work with Difficult Clients and Various Populations.
* ORS utilizes a variety of trainers and TA providers to assist with providing a diverse and comprehensive training agenda with included required trainings, quarterly VR Meeting trainings and independent professional development.  Examples include training provided by Disability Rights Rhode Island/CAP included: Employment Rights/ADA which was also co-presented with Governors Commission on Disabilities; Guardianship which also included CRPs, and a Refresher on CAP and DDRI.  Center for Staff Development and Learning/Department of Human Services; Annual HIPPA, Confidentiality and FTI, Multicultural Competency Trainings Series Advanced Anti-Oppression in the Workplace, Understanding Social Identity, Power and Privilege in the Workplace, Disrupting Implicit Bias with Inclusive Behaviors in the Workplace and Combating Microaggressions with Inclusive Language in the Workplace.; Safety and Security Training(s), Domestic Violence.  IT required trainings throughout the year.  Staff utilized the CRCC E University; Ethical Issues When Working with Offender People, Evidence Based Practices & Rehabilitation Counseling Case Management, Benefits of Employer Provided Accommodations & Role of VRC, Developing a Labor Market Survey, etc.  Cross Department Trainings included SNAP & ET Overview, ORS Services on VR, SBVI and DDS to DHS staff, OSCIL and ORS cross training on services.  Workforce American Job Center Partners Cross Training.  RI Learning Center training included Microsoft Quick Start, Intentional Inclusion, and Thriving in a Multigenerational Work Environment, Inclusive Leadership: Leading a Diverse Team and Effective Communication.  SVR training included Ethics: Gender informed VRC, Contemporary Approaches to VR, Innovative Job Placements, How Rehab Bus. & Professionals can Help Employers Strengthen Their Accommodation Process, Employment Supports for People with Serious Mental Illness.
* Work Incentives Planning and Assistance: Introduction, SSA Cost Reimbursement 101, Emerging Leadership Training, Case Documentation, Introductions to the pending ECMS included Academy Modules, Fiscal Interface, Wage and TTW Interface, VRC Walkthrough Demo, Support Staff Demo, etc. Enhanced Financial Management Training to Assist with Accurately Completing Financial Reports and RSA Updates/Reports, ASL Classes, Tilting at Windmills, UMASS Work Without Limits EN Services. Integrated Resource Team, Tarasoff and Duty to Report.
* ORS continues to seek out guidance and expertise of the various technical assistant entities such as VRTAC.  These resources have been and will continue to be important in assisting ORS with maintaining knowledge and expertise as the provision of vocational rehabilitation services, employer engagement and outcomes continues to evolve.  Additionally, with ongoing staff transition within the VR program and agency, ORS has utilized these resources to assist with Emerging Leadership Development, Non-Delegable Responsibilities & Organizational Structure Update, Improving Retention of State VRCs, Rapid Engagement, Integrated Resource Team, VR Grants Management Training Certificate Program, Credential Attainment, Hispanic Individual's with Disability Building Business Partnerships, etc.
* ORS provided combined trainings for Vendors and VR staff examples include Guardianship by DDRI, Supported Employment Braiding & Sequencing of Funds for BHDDH funded Providers and What does it Take to Become a Benefits Counselor.
* ORS staff have access to the resources available through Assistive Technology Access Program (ATAP) and Adaptive Telephone Equipment Loan (ATEL).  The ATAP program director and partners provide training and updates to staff on the changing technology.  Staff are notified of training opportunities.
* ORS will continue to utilize the Technical Assistance Center(s) (VRTAC-QM) to strengthen its knowledge of the business community and use of Labor Market Information in the provision of Vocational Rehabilitation services.
* ORS has enlisted the VRTAC-QM to assist in addressing the following WIOA requirements: (1) Effective Implementation of Pre-ETS; (2) Effective transition to the common performance outcome measures; (3) Internal Controls, and (4) Develop partnerships to better meet business engagement and employer supports.
* ORS will continue to distribute articles, information, and literature about WIOA and vocational rehabilitation practices at supervisory meetings, regional team meetings, and training sessions.  All staff utilize the internal ORS Rehab Counselor email for distribution and sharing of resources.

##### 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.

A.   Rhode Island does not have a state-approved or recognized licensure or registration requirement for Rehabilitation Counselors.  Office of Rehabilitation Services has elected to base its minimum personnel standards for recruitment of counselors on the requirement of a Master's degree in Rehabilitation Counseling.     Due to the lack of qualified candidates for vacancies, ORS continues to explore multiple ways to restructure the Rehabilitation Counselor position while maintaining the Master’s Degree Requirement.  If any methodology is developed that might allow for recruitment efforts who might have a Master’s Degree in a related field, ORS will work with the SRC and State Personnel to bring that change forward,

* ORS is also exploring other options up to changing the VR Counselor position through the State HR system to better align with other State VR agencies who have determined that the Master’s Degree requirement has been the ultimate obstacle that has stymied their hiring efforts.
* Those States have reduced the education and experience requirements to a Bachelor’s in a related field.  ORS will be considering that as an additional option as recruitment efforts continue to fail and ORS vacancies continue to increase (due to retirement, other agency recruitment efforts, or from promotional opportunities within ORS) and the Universities that do offer Rehabilitation Counseling report lower admissions for that Degree.  It appears that those numbers will not suffice to replace current and future vacancies.   ORS will ensure that the Education and experience requirements are consistent with the VR program regulations for personnel standards as describe in 34 C. F. R. 361.18(c).
* ORS has been able to meet the CSPD standard of filling all VR Counselor vacancies with individuals with a master's degree in Rehabilitation Counseling, but lack of candidates raises concerns about being able to continue to meet this standard.
* ORS will continue to offer paid practicum/internship opportunities for students in MA Rehabilitation Counseling programs and will continue to work with institutions of higher education to recruit qualified individuals to fill vacancies.
* ORS will also continue to accept interns through the State Internship program which affords high school and college level individuals an opportunity to work in and experience the VR Program.
* ORS will continue to reach out to local colleges with Human Services programs and attend career days to promote a career as a Rehabilitation Counselor.  ORS discusses how a Rehabilitation Counselor could be part of a career path for individuals in the Human Services field.
* ORS is hiring 5 Rehabilitation Technicians that will act as case aides to assist Rehabilitation Counselors until additional Master’s Level staff can be hired, or other options are developed.
* ORS will continue to fill all fiscal, support staff and case aide vacancies with individuals who meet state requirements for education and experience.
* ORS will continue encourage and support staff seeking a CRCC by paying for the exam preparation class.  The agency will continue to seek Commission on Rehabilitation Counselor Certification (CRCC) credits approval for training provided by ORS. Also, ORS has established the ability for all staff to access training via the CRCC E-University.  Currently ORS has 26 VR Counselors, Supervisors, and Administrators who are CRC certified.

B.   ORS supports and encourages staff training and professional development and maintains a procedural process for individual staff request.  Additionally, ORS provides each staff with a monetary amount for their use in attending individual and/or professional development trainings that they and/or their supervisor see as professional development and skill enhancement.  ORS conducts a by-annual Comprehensive Staff Training Needs Assessment with the most recent one being completed in May of 2023.  The survey focused on staff training needs, professional development needs, and training that would benefit both ORS and vendors.  The results of this assessment assist in ORS with the prioritization of training needs as an agency and/or individually.

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* ORS utilizes a variety of trainers and TA providers to assist with providing a diverse and comprehensive training agenda with included required trainings, quarterly VR Meeting trainings and independent professional development.  Examples include training provided by Disability Rights Rhode Island/CAP included: Employment Rights/ADA which was also co-presented with Governors Commission on Disabilities; Guardianship which also included CRPs, and a Refresher on CAP and DDRI.  Center for Staff Development and Learning/Department of Human Services; Annual HIPPA, Confidentiality and FTI, Multicultural Competency Trainings Series Advanced Anti-Oppression in the Workplace, Understanding Social Identity, Power and Privilege in the Workplace, Disrupting Implicit Bias with Inclusive Behaviors in the Workplace and Combating Microaggressions with Inclusive Language in the Workplace.; Safety and Security Training(s), Domestic Violence.  IT required trainings throughout the year.  Staff utilized the CRCC E University; Ethical Issues When Working with Offender People, Evidence Based Practices & Rehabilitation Counseling Case Management, Benefits of Employer Provided Accommodations & Role of VRC, Developing a Labor Market Survey, etc.  Cross Department Trainings included SNAP & ET Overview, ORS Services on VR, SBVI and DDS to DHS staff, OSCIL and ORS cross training on services.  Workforce American Job Center Partners Cross Training.  RI Learning Center training included Microsoft Quick Start, Intentional Inclusion, and Thriving in a Multigenerational Work Environment, Inclusive Leadership: Leading a Diverse Team and Effective Communication.  SVR training included Ethics: Gender informed VRC, Contemporary Approaches to VR, Innovative Job Placements, How Rehab Bus. & Professionals can Help Employers Strengthen Their Accommodation Process, Employment Supports for People with Serious Mental Illness.
* Work Incentives Planning and Assistance: Introduction, SSA Cost Reimbursement 101, Emerging Leadership Training, Case Documentation, Introductions to the pending ECMS included Academy Modules, Fiscal Interface, Wage and TTW Interface, VRC Walkthrough Demo, Support Staff Demo, etc. Enhanced Financial Management Training to Assist with Accurately Completing Financial Reports and RSA Updates/Reports, ASL Classes, Tilting at Windmills, UMASS Work Without Limits EN Services. Integrated Resource Team, Tarasoff and Duty to Report.
* ORS continues to seek out guidance and expertise of the various technical assistant entities such as VRTAC.  These resources have been and will continue to be important in assisting ORS with maintaining knowledge and expertise as the provision of vocational rehabilitation services, employer engagement and outcomes continues to evolve.  Additionally, with ongoing staff transition within the VR program and agency, ORS has utilized these resources to assist with Emerging Leadership Development, Non-Delegable Responsibilities & Organizational Structure Update, Improving Retention of State VRCs, Rapid Engagement, Integrated Resource Team, VR Grants Management Training Certificate Program, Credential Attainment, Hispanic Individual's with Disability Building Business Partnerships, etc.
* ORS provided combined trainings for Vendors and VR staff examples include Guardianship by DDRI, Supported Employment Braiding & Sequencing of Funds for BHDDH funded Providers and What does it Take to Become a Benefits Counselor.

##### 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.

* Interpreters and translators are available to staff to communicate with diverse customer populations, for staff trainings, and supervision. The Electronic Case Management System allows for entry of individual’s primary language and preferred communication.  It is also Jaws compatible for ORS staff who require that program to maximize functionality.
* ORS utilizes Purple VRI an AT communication device to provide for communication between staff who are Deaf or Hard of Hearing, colleagues, and customers.
* The Blind Service region of ORS has staff who routinely employ alternate forms of communication including enhanced print or contrasted print materials, Braille, tactile sign, software, and voice over programs for text recognition, in addition to a variety of computer/electronic assistive devices and technologies. Additionally, ORS developed guidance for staff in the use of Closed Captioning for Virtual Platforms such as Zoom and Microsoft Office Teams.
* The staff of the Blind Service VR unit of ORS include VR professionals who are themselves blind, as well as those trained in vision rehabilitation teaching and technology, and who serve as a resource for staff development and training in addition to their direct service responsibilities.
* The staff of ORS have access to the resources available through Assistive Technology Access Program (ATAP) and Adaptive Telephone Equipment Loan (ATEL).  The ATAP Program Director and partners provide training and updates to staff on the changing technology.
* The State of Rhode Island has secured the following interpreter services which enable access to ORS information and services: PinPoint, Interpreter Service Video Remote Interpreter and Language Line - The Big Word.  Additionally, ORS utilizes vendor interpreters from a variety of resources and bilingual staff.
* ORS brochures, letters, and forms are reviewed and updated as needed when there is a change to a relevant policy, procedure, program, and or regulatory change.

##### 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.

The Cooperative Agreement between the Rhode Island Department of Elementary and Secondary Education (RIDE) and the Rhode Island Office of Human Services/Office of Rehabilitation Services (DHS/ORS) was completed to facilitate the successful transition of students with disabilities from school into vocational rehabilitation services, and then to successful employment.  As the lead agencies under this agreement, RIDE and DHS/ORS agreed:

* All personnel assigned to responsibilities described in the agreement would comply with the certification requirements of the respective lead agencies.
* As new federal or state requirements or initiatives are identified, DHS/ORS and RIDE will provide joint training for school personnel and ORS staff when possible.
* ORS will plan for statewide implementation of Pre-ETS and transition services in keeping with the Agreement, as well as applicable policies, procedures, and guidelines.  ORS will accept referral of students with disabilities during the transition planning process for the provision of Pre-ETS and transition services.
* ORS will provide consultation and training to school district staff on transition planning to prepare a student to move from school to work or postsecondary education in accordance with the student’s unique needs and provide pre-employment transition services.

As part of the MOU, DHS/ORS and RIDE agree to provide cross-training with agency staff and local school district personnel as needed.  RIDE and DHS/ORS will utilize DHS/ORS Comprehensive Needs Assessment, Transition Council, and the DHS/ORS State Rehabilitation Council assessment information to establish training priorities. The agencies will provide professional development and will notify RI Transition Council partner agencies of new programs that are developed. Both parties will jointly fund and sponsor training for their respective staff members and LEA personnel. Training will focus on existing and new state or federal requirements or initiatives that impact the provision of services by both entities concerning education of individuals with disabilities, their transition from school to employment, vocational rehabilitation services, assistive technology, higher education, and training opportunities.

#### 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.

**I. COOPERATIVE AGREEMENT WITH RHODE ISLAND DEPARTMENT OF EDUCATION (RIDE)**

* INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:

A Cooperative Agreement (CA) with the RI Department of Education (RIDE) enables ORS to provide consultation and technical assistance to high school personnel and to provide transition services to in-school youth. An updated MOU has been completed and signed with the Rehabilitation Services Administration, advisory to ensure that the new MOU meets the federal standards, and RIDE and ORS agreed to amend the new MOU to reflect those advisories.

The plans and procedures for coordination with RIDE and ORS, an RSA Best Practice, has been the foundation of a collaborative relationship focused on school-to-work transition for over twenty years. The formal agreement between ORS and RIDE describes interagency collaboration and coordination, explains the roles and responsibilities of each partner, and the process for resolving disagreements.  In addition, a Collaborative Services Chart (CSC) identifies the agency primarily responsible for services in each of the following categories: Assessment Services, Career Development Services, Community Living Services, Related Services and Auxiliary Services. This collaboration has enabled ORS to have a MA level Rehabilitation Counselor at each high school to provide and coordinate an array of services. ORS, through this partnership with RIDE, is well equipped to continue to provide an array of transition services and consultation in addition to WIOA Pre-Employment Transition Services (Pre-ETS.)

Two Memorandum of Understanding (MOU) are in place for RIDE, ORS, and the state Developmental Disability agency - Behavioral Health, Developmental Disabilities and Hospitals (BHDDH). One MOU defines the working relationship between the three parties, and the other MOU addresses data sharing for the state agencies. The Department of Justice (DOJ)/State Consent Decree required that each of these MOUs be developed and implemented to ensure that the responsibility for services and implementation of Employment First principles occurs within RI in a manner consistent with the mandates of the DOJ/State Consent Decree. In-school youth with significant intellectual disabilities are entitled to access to an array of transition planning, career exploration/discovery services, and community-based work experiences prior to graduation from high school. The MOU describes the relationship between the parties and data collection and sharing to demonstrate that deliverables of the DOJ/State Consent Decree are occurring as prescribed.

* VOCATIONAL REHABILITATION SERVICES/INDIVIDUALIZED PLAN FOR EMPLOYMENT:

The CA between ORS and RIDE provides the foundation for ORS Vocational Rehabilitation Counselors’ presence within each public high school in the state.

The referral to ORS from the Local Education Authority (LEA), with parental/guardian consent, is the first step in the referral process. The ORS Vocational Rehabilitation Counselor then conducts an intake meeting with the youth and family to explain services, the eligibility determination process, and the purpose of the program. This initial meeting creates the foundation for ORS Transition and Pre-ETS and includes the process for informed choice for student/family to register just for Pre-ETS services or apply for the full array of VR services. Under the auspices of the Cooperative Agreement, ORS can assist in-school youth with disabilities in collaboration with each LEA. These transition services and pre-employment transition services fall under the requirements outlined in the 2014 Workforce Innovation and Opportunities Act (WIOA) to prepare students for employment after high school.  Counselors meet with potentially eligible students with disabilities and their parents/guardians to give them informed choice options as described above. Office of Rehabilitation Services strives and is committed to assist all students with significant disabilities to gain the necessary skills, preparation, exploration, and supports to enter the workforce. Inherent in the ORS Transition and Pre-ETS Program is an expectation that all students who are found eligible for services will have an ORS-approved Individualized Plan for Employment (IPE) developed within 90 days of eligibility (Status 10), and updated as appropriate, and again prior to graduation.   ORS will reserve the ability to close categories if funding levels or staffing levels change, or ORS sees a dramatic uptick in applications post-pandemic.

The IPE establishes an employment goal and the associated steps/services needed to reach that goal. The IPE goal for students with disabilities is considered exploratory, as it will probably change with increased exposure to career information and work experiences. The ORS Transition and Pre-ETS provided to students with disabilities includes the five required services, as well as additional services under an IPE which include: Counseling and Guidance, Vocational Evaluations/Exploration and Assessments, Community-Based Work Experiences, Tri-Employment Program, Transition Academy participation, Summer Work, Project Search, ORS/LEA Community Employment Projects, and travel training.   Over the past couple of years ORS has piloted and now fully implemented multiple services which include our Middle School career awareness program, a 9th and 10th grade Work Readiness Program; Career Chats where students connect with businesses and hear/learn about the requirements and details of specific career paths; an interviewing-skills workshop; and a collaboration with The University of RI’s S.T.A.R.T. URI, a transition program working with students with Autism/Asperger’s. For the 23-24 school year ORS is looking to expand Pre-ETS to include a Career and Technical Education (CTE) collaborations with school districts, giving students an opportunity to gain knowledge and skill around specific career paths.

The DOJ/State Consent Decree has additional expectations of ORS services for in-school youth with significant intellectual disabilities (I/DD). DOJ expects all students with I/DD to have an opportunity to experience 120 days of Work Based Learning  experiences prior to exit from public education. Therefore, ORS services incorporate a review of the Career Development Plan (CDP) with the Transition team of any community/work experiences that have already occurred. The team, including the student and family, determine the additional school/home/ community experience needed to augment the employment exploration services already provided by the LEA. These ORS opportunities may include ORS-supported services. This information will assist the Transition team to achieve the two 60-day Work Based Learning Experiences mandate of the DOJ/State Consent Decree.

In December 2022 there were eight transition court actions which became part of the consent decree.  These court actions center around moving students with I/DD from work trial to full employment prior to exit from high school. In collaboration with RIDE and BHDDH, ORS has developed a multi-tiered approach to support and collaborate with school district to meet mutual CD goals.

The student and his/her family’s involvement with ORS will support the student’s transition from high school to adult services/employment. The relationship established between the student, family, and Vocational Rehabilitation Counselor is already in place upon graduation.

Per State of Rhode Island laws, the age range for pre-employment transition services is at minimum 14 years through age 22.

##### 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 C.F.R. § 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 C.F.R. part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and

###### F. Assurance that, in accordance with 34 C.F.R. § 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 C.F.R. § 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.

A.     RIDE has contracts with the Regional Transition Centers to support transition, planning, and disseminate information about adult services within each high school.  Each fall, the ORS Rehabilitation Counselor, in collaboration with the local Regional Transition Coordinator (RTC), and BHDDH staff, provide an orientation to Special Education/Transition personnel about adult services in general and Vocational Rehabilitation services in particular.  ORS Counselors provide and share information regarding adult services; typically, the ORS Counselor at each high school provides specific information regarding ORS services.  The RTC supports the sharing and dissemination of ORS information.  This “Introduction to State Services” is to inform school staff about services and eligibility for programs and includes employment/supported employment programming that may be available, as well as services from the State’s Department of Developmental Disabilities as appropriate.  This Orientation meeting serves as an opportunity to reinforce the referral process to ORS.

In addition to the school-based interventions and consultation with the LEA, ORS is involved in each region’s Transition Advisory Committee (TAC), the statewide Transition Council, and a myriad of other system development efforts to enhance work experiences and transition for in-school youth with disabilities, regardless of IEP/504 status.

Each high school has an identified ORS Vocational Rehabilitation Counselor as a liaison available to consult, provide technical assistance, review student progress, attend IEP meetings, discuss Pre-ETS, Order of Selection, and accept referrals. The ORS Rehabilitation Counselor establishes a schedule with each school so that IEPs, CDPs, referrals, and consultation can be arranged on the days that the counselor is physically present at the school, if possible.  Consultation by VR transition counselors is also available to the transition/IEP/CDP teams at LEAs.

B.   ORS and each Local Education Authority (LEA) collaborate to meet the transition needs of youth with significant disabilities. Each high school has an identified ORS Vocational Rehabilitation Counselor as a liaison available to consult, provide technical assistance, review student progress, attend IEP meetings, discuss Pre-ETS,  and accept referrals.

ORS may provide transition or pre-employment transition services to eligible or potentially eligible students with disabilities. ORS will provide all five of the required Pre-ETS services and other services which may include, as appropriate, counseling and guidance, job exploration and assessments, work readiness workshops, Community Based Work Experience, Tri Employment Program, Transition Academy participation, Summer Work, ORS/LEA Community Employment Projects, and travel training; however only the five required pre-employment transition services may be provided to potentially eligible students with disabilities. All other services may be provided to eligible students with disabilities under an IPE. The results of these interventions are shared with the student, families, and school personnel so that planning and academic programming in school is influenced by the findings and needs identified through ORS transition services. These services are provided based on the individualized needs of each student as identified by the team, family, and student. Any career exploration, internships, or volunteer activities completed by the LEA provide valuable vocationally relevant information to the discussion and planning process. These activities are considered work experiences, and so are important to consider as ORS and the LEA plans next steps and post high school objectives and needs.

The DOJ/State Consent Decree has added some additional expectations of ORS and LEAs for in-school youth with significant intellectual disabilities (I/DD). The DOJ requires each high school to develop Career Development Plans (CDP) on all in-school youth with I/DD or those who may be eligible for adult services (many youths who qualify for DD do not have a primary disability of I/DD, i.e., Autism, Cerebral Palsy, etc.) beginning at age fourteen and reviewed annually. ORS contributes to this process through Vocational Rehabilitation Counselor attendance and/or consultation to the transition team meetings. In addition, the DOJ/State Consent Decree requires in-school youth with I/DD to experience two 60-day Work Based Learning Experiences prior to graduation. Therefore, ORS services incorporate a review with the CDP team (Student, family, LEA, BHDDH & ORS representation) of any community/work experiences that have occurred. The team, including the student and family, determine the additional school/home/community experience needed to augment the employment exploration services already provided by the LEA. These ORS opportunities may include such services as: Community-Based Work Experiences, Transition Academies, Summer Employment Alliance, Summer Work, Project Search, and other work experiences. This information will assist the team and the Vocational Rehabilitation Counselor in achieving the two 60-day Work Based Learning Experience mandate of the DOJ/State Consent Decree. As mentioned previously, as of December 2022 each student under the CD and on a CDP will be expected to leave high school with paid employment.  ORS will work collaboratively with school districts by continuing to provide all the valuable assessments, and exploratory employment services and as students develop their employment interest and skills ORS in partnership with schools and CRP’s can develop employment sites and supports to be successful in the community.

C.   ROLES AND RESPONSIBILITIES OF ORS AND RIDE:

A. FINANCIAL:   RIDE and LEAs will be responsible for transition services mandated by Federal and State laws and regulations. DHS/ORS will be responsible for Transition and Pre-Employment Transition services (PRE-ETS) consistent with the Rehabilitation Act, as Amended by WIOA 2014. RIDE will be responsible for ensuring that a free and appropriate education (FAPE) is made available to eligible students, including special education services included in the individualized education program (IEP), as authorized by the IDEA.

Pursuant to 34 C.F.R. §300. 1 54(b)361.22(c), nothing in this part will be construed to reduce the obligation under the Individuals with Disabilities Education Act (20 U .S.C. 1400 et seq.) of a local educational agency or any other agency to provide or pay for any transition services that are also considered special education or related services and that are necessary for ensuring a free appropriate public education (FAPE) to children with disabilities within the State involved.

Section 113(a)(b) of the Rehabilitation Act, as well as final §361.48(a)(2), requires ORS, in collaboration with the RIDE, to ensure that the required five PRE-ETS services are made available statewide to all students with disabilities in need of such services. RIDE will support ORS's collaboration with Local Education Authorities (LEA) in providing or arranging for the five required PRE-ETS described in this agreement to students with documented disabilities (students 14 years of age through their exit from high school) as defined under §361.5(c)(51), based on individual need once a student requests or is recommended for one or more of the PRE-ETS services. Any PRE-ETS service that ORS provides will be available to students identified by the school of record or to a student known as a person with a disability by the VR counselor.  ORS will continue to offer a series of Pre-ETS for students age 14 through 22, to better prepare students with disabilities about employment.

B. JOINT RESPONSIBILITIES:   Both RIDE and ORS/DHS are the lead agencies in executing the Cooperative Agreement (CA) as follows:

* All personnel assigned to responsibilities described in this agreement will comply with the certification requirements of the respective lead agencies.
* RIDE and DHS/ORS will utilize the RI Transition Council and the State Rehabilitation Counsel as a venue for developing transition-related policies in the respective agencies.
* RIDE and DHS/ORS will follow their own agency's policies for the review and development of policies including the review of the Special Education Advisory Committee.
* RIDE and DHS/ORS will notify each other when new policies are in development or of policies that are being revised, to encourage collaboration in policy development related to transition. • As new federal or state requirements or initiatives are identified, YR and RIDE will provide joint training to school personnel and YR staff whenever possible.
* ORS and RIDE will address issues and concerns related to coordination and implementation of PRE-ETS and transition services in schools.
* If roles and responsibilities for the provision of PRE-ETS and transition services are unclear, ORS will contact the appropriate RIDE IDEA staff to clarify the roles and responsibilities of each entity.
* RIDE will support ORS staff in efforts to assist LEAs on issues and concerns related to coordination and implementation of pre-employment transition services and transition services.
* Inform staff, students, legal guardians, and parents of the mandates found in the 2013 Consent Decree between the DOJ and the state of Rhode Island which have requirements about integrated work experiences and competitive employment as expectations of Rhode Island as an Employment First state.

C.   DHS/ORS RESPONSIBILITIES:   The DHS/ORS Associate Director or his/her designee will assign a Vocational Rehabilitation Counselor to each comprehensive high school in the state. The list of assigned Vocational Rehabilitation Counselor will be included in RIDE and DHS/ORS promotional materials.

* Assigned Vocational Rehabilitation Counselors will maintain a schedule of availability in each assigned school and convey this schedule to appropriate local education agency personnel.
* DHS/ORS is responsible for the implementation and compliance of Title IV of the Rehabilitation Act as amended by WIOA and all related Rhode Island laws and regulations.
* DHS/ORS will request LEAs, through the high school department chair or designee, to make every effort to schedule Individual Education Program (IEP) meetings during the scheduled hours of the Vocational Rehabilitation Counselor no less than one month prior to the IEP meeting. If the assigned counselor is unable to attend the meeting, the school personnel, student, and parent will have materials about Vocational Rehabilitation Services available for the IEP. Assigned Rehabilitation Counselors will make every attempt to attend IEP meetings for DHS/ORS eligible students expecting to graduate in two years or less.
* Rehabilitation Counselors will make efforts to attend meetings and events at assigned schools to share information about Vocational Rehabilitation including PRE-ETS, adult services, transition services, materials and the Order of Selection with students, parents, special education staff and school personnel. Rehabilitation Counselors will provide brochures and materials about the VR process and services to the school districts for distribution to students, parents, legal guardians, teachers, and others.
* Students with disabilities, including those who have not yet applied for or been determined eligible for VR services will be informed by ORS of their ability to participate and receive the PRE-ETS services they may need. These services will be described and included in the IEP as appropriate, along with the identified Transition services.
* ORS will plan for statewide implementation of PRE-ETS and transition services in keeping with this Agreement, policies, procedures, and guidelines.
* ORS will accept referral of students with disabilities during the transition planning process for the provision of PRE-ETS and Transition services.
* ORS will provide consultation with and training to school district staff on transition planning to prepare a student to move from school to work or post-secondary education in accordance with the student's unique needs as determined through the IEP/504 process and provision of pre-employment transition services.
* Assess, plan, develop and provide VR services for eligible individuals with disabilities who have been referred for VR services, consistent with their strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice, so that such individuals may prepare for and engage in competitive, integrated employment.
* Develop an Individualized Plan for Employment (IPE), which is consistent with, and which takes into consideration the student-client's Individualized Education Plan (IEP), within 90 days of VR eligibility determination, unless an extension is approved.
* Provide consultation to assist in the identification of eligible and potentially eligible students with disabilities and assessment of their individual needs.
* Provide or arrange for the provision of services required by the IPE goal, when the student has been determined eligible for VR and the services are specific to his/her employment outcome and are not services customarily provided to the student by the LEA under the Individuals with Disabilities Education Act (IDEA).
* Provide information to parents and/or guardian(s), student/clients regarding VR eligibility, Order of Selection, vocational assessment for employment and postsecondary planning and Client Assistance Program (CAP).
* Obtain written consent for the release of confidential information, pursuant to ORS policy and procedures, federal and state laws, and regulations regarding confidentiality.
* Share information regarding policies, procedures, guidelines, programs, and services for the purpose of improving the access to, and availability of, PRE-ETS and Transition services.
* Promote employer participation in providing opportunities for work-based learning for students with disabilities.
* DHS/ORS will assist with identification of students with disabilities for PRE-ETS and Transition services and who may be eligible for services.
* DHS/ORS will ensure applications are widely available to students with disabilities and their families; describe the referral process, application procedures, as well as timelines for each; provide informational literature; and explain eligibility requirements and the eligibility determination timeline. When an application is submitted, ORS will make an eligibility determination within 60 days unless exceptional and unforeseen circumstances beyond ORS's control preclude making an eligibility determination within 60 days and ORS and the students with disabilities agree to a specific extension of time.
* DHS/ORS will maintain an active presence and receive referrals of students with disabilities for pre-employment transition services as well as potential ORS applicants at: parent support groups, parent forums hosted by high schools, transition and career fairs, programs providing independent living skills training, organizations serving youth who are blind, partially sighted, deaf, hard of hearing or deaf-blind.
* Referral for ORS services can occur at any time during the school year and will be processed immediately upon receipt. ORS will communicate by phone, mail, or email with the referred students with disabilities and parents, as needed and appropriate, to submit an application and/or schedule an intake appointment.

D. RIDE AND LOCAL EDUCATON AGENCY (LEA) RESPONSIBILITES:

* High school department chair or designee will strive to schedule Individual Education Program (IEP) meetings during scheduled hours of the Rehabilitation Counselor no less than one month prior to the IEP meeting. If the assigned counselor is unable to attend the meeting, the school personnel, student, and parent will have materials about ORS for the IEP meeting.
* The development, scheduling and coordination of the IEP meeting.
* Mechanisms to monitor the implementation of this section of the CA will be included in the RIDE School Support Monitoring process.
* RIDE and LEAs will support ORS in the dissemination and implementation of pre-employment transition services information and programming.
* RIDE will assign the State Transition Coordinator. This CA does not reduce the obligation under IDEA of a local education authority or any other agency to provide or pay for any transition services that are also considered special education or related services and that are necessary for ensuring a free appropriate public education to students with disabilities within the state.

D. The LEA identifies students with disabilities who may be eligible for transition services with ORS and facilitates a formal referral to the agency with parental approval. The LEA provides education records as part of the referral packet to ORS. Upon receipt of the referral packet, approved by the parents, the ORS Vocational Rehabilitation Counselor schedules a meeting with the student and family to explain the program, become familiar with the student, and plan next steps. The Vocational Rehabilitation Counselor will explain Pre-ETS services, Order of Selection, and provide informed choice options, including whether to register for Pre-ETS services or apply for VR services. Eligibility determination must occur within 60 days of application, and IPE must be developed within 90 days of eligibility.

At times, school personnel may request Vocational Rehabilitation Counselor presence at an IEP meeting prior to a formal referral to ORS.  Consultation by VR transition counselors is also available to the transition/IEP/CDP teams at LEAs.

E.  Section 511 of the Rehabilitation Act requires that anyone age 24 or younger may not start at subminimum wage unless it is documented that the person received pre-employment transition services or transition services under the Individuals with Disabilities Education Act (IDEA). and/or applied for ORS services and was unable to be successfully employed in an integrated competitive employment setting. For the purposes of a 2013 Consent Decree between the DOJ and state of RI, RIDE supports ORS in promoting Supported Employment Services where the individual is compensated at or above minimum wage in an integrated employment setting.

F.   State of Rhode Island has not had subminimum wage or 14(c) certificates since 2019.

#### 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.

1. ***VR Services***

The Office of Rehabilitation Services (ORS) has several existing partnerships and services that involve the business community. On a fee-for-service basis, Community Rehabilitation Program (CRP) vendors provide Community-Based Work Experiences (CBWEs) to offer customers paid, community-based, integrated work experiences consistent with customer interests. This service provides a unique opportunity for ORS to assess an individuals’ work skills and behaviors within a “real” business environment. The employer provides feedback to the agency and the customer about the individual’s skills and potential in a particular occupation. Some of these assessments have resulted in a job match, while others have provided information to justify on-going education/training in the field or in some cases exploration of alternate careers. In addition, ORS coordinates with employers and potential hires in On-the-Job Training (OJT) opportunities.  ORS has collaborated with DLT on efforts to maximize DLT’s Work Immersion program (offering up to 12 weeks of paid employment in a community-based work setting) and OJT program to ensure that collaborative funding takes place between customers of both agencies.  Additionally, ORS is exploring other possible Adult Project Search sites to be developed and implemented, as the RI Hospital site was discontinued post-COVID-19.  This was an effort that utilized collaborative funding between ORS. DLT/RealJobsRI, and BHDDH.

The Workforce Development Assistant Administrator and the agency’s Business Engagement Specialist Team (BEST) has continued to expand employer partnerships with a myriad of companies in Rhode Island. Each partnership has a liaison, or one point of contact assigned to that business.  The liaison not only works with that business assisting with their workforce needs but also is available for disability awareness training, tax incentive information and information regarding assistive technology or accommodations.     When provided with job openings from these partners, the liaison will then share that information with the BEST Team who then review the information with their respective regions so that qualified candidates can be identified.  Once a qualified job seeker has applied and after a confidential release has been obtained, an ORS BEST representative contacts the employer and job develops on the qualified job seeker’s behalf. ORS is exploring different business engagement models with VRTAC-QM as a strategy to better align our Community Rehabilitation Program vendors and services with WIOA workforce development efforts.  The Workforce Development Assistant Administrator also receives daily job postings from the Department of Labor and Training, JOBfindah Network, VOCcentral and NET (National Employment Team).

The COVID pandemic significantly affected employment services across the board, especially job development and placement and most in person or community-based programming.  As a result of the Pandemic ORS developed an array of Virtual Services to ensure that individuals would continue to receive vocational services. The array of virtual services produced successful results in keeping individuals engaged in services and to assist them in moving forward towards their vocational goals.  ORS has found that having this hybrid model has allowed for increased efficiency for services, especially on a group basis; individualized services, however, have also been seen as productive, especially when face to face employment services were not available.  These Virtual Services were developed across SE, Non-SE and Pre-ETS fee for service programming.  ORS has also recently added new vendors who offer virtual short term non degree trainings, including a number of Computer and IT trainings.  This new service has opened employment opportunities for customers who otherwise would not have been able to attend a training in person.

In the post-COVID economy, ORS will continue to work with employers and CRPs to develop a coordinated effort to ensure that employers get the qualified candidates for their vacancies, and customers are provided more opportunities for jobs out in the community.  The BEST team will work with other VR staff to consult on cases, discuss job openings and make connections as appropriate to employers.  ORS will further coordinate with DLT on sharing leads that ORS cannot fill to ensure that employers needs are optimally met.   ORS is holding Employer Forums bi-annually in the Spring and Fall and will reach out to all their employer contacts and will have the community providers do the same.  The Forum will consist of presenters,  and employers will also have the opportunity to separate into small groups and discuss how ORS can assist the employers with their workforce needs, disability awareness and other disability related information and training.

ORS is exploring how to increase capacity and competency of Direct Support Professionals with BHDDH and DLT.

ORS is outreaching to employers to develop Adult Project Search locations.  These efforts will continue to be offered to participants State-wide and funding will be via collaborative sequenced funding through ORS, BHDDH and DLT.

Vendors are cross training Direct Support Professionals (DSP) to do VR services if an employee is out for a period of time. This will allow for service delivery to be consistent, in turn assisting employers to meet their needs for retention services.

COMPREHENSIVE NEEDS ASSESSMENT:

ORS conducted a state-wide Comprehensive Needs Assessment (CNA) in collaboration with the SRC in 2021. This CNA incorporated a component related to the needs of the business community to bridge gaps between employers and individuals and to create a foundation for developing new and innovative training and services specific to help individuals to remove personal and other barriers they face to obtain and maintain competitive, integrated employment.  The findings are being incorporated into State Plan goals and strategies.

MARKETING/OUTREACH STRATEGY:

ORS will continue collaboration with its state partners and the SRC to explore development of a marketing plan to target specific business sectors. This will help the continuation of strategies to promote better awareness of ORS and its scope of services. Collaboration with the Governor’s Workforce Board, the Workforce Investment Boards (WIBs), Rhode Island Department of Education (RIDE), and Rhode Island Department of Labor and Training (DLT) is critical as the state implements the Comprehensive System Change Plan (CSIP).

1. *Transition services, including pre-employment transition services, for students and youth with disabilities.*

**PRE-EMPLOYMENT TRANSITION SERVICES (Pre-ETS):**

As a component of the Pre-ETS program, ORS, in collaboration with other partners, has instituted several Project Search programs within the healthcare and business sectors. The State emphasis a commitment to Employment First principles for individuals with significant intellectual disabilities has helped to facilitate RI Project Search, a nationally recognized program with successful outcomes for persons with I/DD, becoming a reality. The first Miriam Hospital Project Search – started in 2014, was a success, and the program was replicated with Blue Cross Blue Shield in 2015, and an additional site in 2016 at Newport Hospital.  Each Project Search is offered statewide to youth in transition.  Program is funded in part by ORS, school system, and DLT.

In addition, ORS has funded summer work experiences for youth since 2010. We have added College Summer Work experiences which connects employers with students who have gained career specific skills through college or post-secondary school. ORS has also developed two other Pre-ETS work initiatives, Summer Employment Alliance and twelve Tri-Employment programs for work experiences to potentially eligible students with disabilities. All of these work experiences are in integrated community-based work settings paid at minimum wage or above.

As Pre-ETS is a highly prescriptive set of services under WIOA, ORS can also report on the overall numbers as identified in census as registered for Pre-ETS.  Current ORS census has 1,272 identified Pre-ETS individuals.

#### l. 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;

ORS continues to be the lead and implementing agency for the State Grants for Assistive Technology. In this role, ORS has facilitated a program called the Assistive Technology Access Partnership (ATAP). This partnership relies on contractual relationships with Ocean State Center for Independent Living (OSCIL), TechACCESS of RI, and East Bay Educational Collaborative to provide performance-measured services including device loans, demonstrations, device re-utilization, public awareness, and information and assistance.

ORS also operates a state-funded program called the Adaptive Telephone Equipment Loan (ATEL) program, that is included in the ATAP partnership. Based on ATAP’s strong collaboration, ORS utilizes ATAP services for ORS clients who need access to the above services for resources, vocational assessments, and job retention, as well as making sure an individual is able to utilize technology recommended to them to increase their vocational and independent living potential.  Device loan allows an individual to trial a piece of technology to increase their skills or bridge a gap in services.  The goal is to provide quality assistive technology access and allow individuals to make an informed choice.

In conjunction with ORS’, ATAP in-house staff and ATAP Partners provides training to ORS Vocational Rehabilitation Counselors and ORS Vocational Fee for Service Vendors about assistive technology and the services of the program to better support the individuals we support.

Every Fall ATAP Partners also participate in TechACCESS of Rhode Island’s Assistive Technology Conference of New England.  In the Spring, ATAP partners participate in an Assistive Technology Awareness Day, providing assistance, information, and demonstration.  ORS’ ATAP in-house staff and ATAP partners continue to increase their knowledge of assistive technology that is constantly changing, and the paradigm shifts that go with it to provide expert supports to individuals working with ORS to achieve their vocational goals.

##### 2. Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;

ORS does not have such cooperative agreements at this time.

##### 3. Non-educational agencies serving out-of-school youth;

ORS has cultivated a strong working relationship with numerous agencies that support out-of-school youth.  The RI Ocean State Center for Independent Living (OSCIL) offers services to augment vocational rehabilitation services. OSCIL  can provide support services, advocacy services, home assessments, independent living skills/assistive technology assessment, and information and referral services.  Other agencies that support out-of-school youth include:  LAZO, Fast Track, Launched Beginnings, and BestLifeRI. ORS also participates with the DLT in reviewing their requests for proposals for training programs and other services. Both Workforce Investment Boards of RI also have youth subcommittees of which ORS has been a participant, though the subcommittees have not met this year.

##### 4. State use contracting programs;

ORS does not participate in 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.);

**THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT**:

Rhode Island has a work incentive program called the Sherlock Plan which enables individuals with significant disabilities to maintain Medicaid while working. The Sherlock Plan is administered by the Department of Human Services (DHS). However, the complexities of increased income on other benefits such as the Developmental Disability agency’s service cost share, subsidized housing, and food stamps requires considerable coordination among the state agencies. ORS participates on a monthly case coordination team that examines the Sherlock Plan to identify obstacles, increase inter- and intra-agency collaboration, and develop possible solutions.

In addition, the Department of Justice State Consent Decree (CD) and Interim Settlement Agreement (ISA) require all individuals with significant intellectual disabilities receive benefits planning information through a complete individualized Benefit Analysis by a Benefits Counselor. ORS is working with DHS, Behavioral Health, Developmental Disabilities and Hospitals (BHDDH), Disability Rights Rhode Island, and Advocates in Action to report on obstacles to individuals, to explore increasing capacity, and to examine how the service can be reimbursed by Medicaid. ORS has collaborated with the Sherlock Center on Disabilities (RI’s University Centers for Excellence in Developmental Disabilities Education, Research, and Service (UCEDD) program) to ensure that community forums are set up to disseminate benefits counseling information to families, individuals, stakeholders, and transition aged youth as the first step in increasing knowledge of work incentives.  For the past several years, ORS has paid for the benefits counselors’ time in these public forums to ensure more WIPA funds are available for 1:1 benefits counseling. ORS has collaborated with the Sherlock Center, which currently holds the WIPA grant, to increase the overall number of benefit counselors available in the state since available Benefits Counselors are declining due to attrition.

##### 6. State agency responsible for providing services for individuals with developmental disabilities;

ORS has a long-standing history of collaboration with the RI agency responsible for services to individuals with developmental disabilities - Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH). ORS funds an array of Supported Employment services for adults and youth with Developmental Disabilities through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRPs). Many of these Supported Employment (SE) CRPs are also licensed by BHDDH to provide residential, case management, and support services to individuals with developmental disabilities.  ORS continues to provide Supported Employment services as a means to enable individuals with the most significant disabilities to have access to competitive integrated employment opportunities.

ORS sponsors and participates in the Developmental Disabilities Supported Employment  Council and Behavioral Health Supported Employment Council and has a representative on the Developmental Disabilities Council.  ORS also has representation on the board of the RI Chapter of the Association of Professionals Supporting Employment First (RIAPSE.)

ORS has a referral, liaison, and consultative relationship with the CRPs and funds a continuum of Supported Employment services through the customer-selected CRP.

The objective of the SE services is in competitive integrated employment as an outcome, and for VR, at a minimum of ten hours per week at commensurate wages. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs - who also rely on BHDDH funding - to provide the long-term supports that help sustain employment for individuals with significant developmental disabilities. Long-term supports are planned for and included in the customers’ ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and duration of each Supported Employment service. The IPE also identifies the CRP accepting responsibility to provide long-term and intermittent support services to the individual with a disability. The time frame for transitioning a customer from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the individual needs of each customer.  ORS has been working with CRPs who provide Supported Employment services to improve the quality and availability of employment-related services via ORS funded trainings, presentations, technical assistance and mentoring by liaison staff from ORS.

As the funding source, ORS holds a quarterly meeting with all the I/DD Supported Employment CRPs to ensure consistency in service delivery, appropriate employment outcomes are being reached, and to offer support.  ORS and BHDDH have also enlisted technical assistance providers to explore collaborative “sequenced” funding to maximize SE dollars. ORS and BHDDH have provided annual training to the CRP’s about Braiding and Sequencing of available funds. ORS has increased the fee-for-service rates in all its service fees to pay Vendors a rate that is more commensurate with the national vocational rehabilitation rates.

In 2014, the State of RI negotiated a Consent Decree (CD) and Interim Settlement Agreement (ISA) with the Department of Justice (DOJ) to ensure that Employment First Principles and practices are utilized in planning and service delivery to adults, in-school youth, and out-school youth with significant intellectual disabilities (I/DD) who need access to the continuum of Supported Employment services to work. The DOJ/State Consent Decree requires three state agencies: (1) Office of Rehabilitation Services (ORS), (2) the Rhode Island Department of Education (RIDE), and (3) the Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to develop and implement a service-delivery system that ensures individuals, both adults and youth, with I/DD have access to integrated competitive employment opportunities in order to make fully-informed choices about work. The three state agencies are obligated by the DOJ/State Consent Decree to develop Cooperative Agreements, Data Exchange Agreements, and joint Continuous Quality Improvement efforts as elements/requirements of the CD and ISA.  These obligations have been developed and are in place currently, with quarterly reporting to the DOJ and Court Monitor on data, process, and continuous quality improvement.

##### 7. State agency responsible for providing mental health services; and

ORS has a long-standing history of collaboration with the RI agency responsible for services to individuals with mental health issues - Behavioral Health, Developmental Disabilities and Hospitals (BHDDH).

ORS funds an array of Supported Employment services for adults and youth with Behavioral Health issues through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRP). Many of these Supported Employment CRPs are also licensed by BHDDH to provide support services to individuals with behavioral health disabilities.

ORS sponsors and participates in the Supported Employment Council for Behavioral Health. MA level Rehabilitation Counselors function as liaisons to CRPs and agencies that offer SE services to individuals with behavioral health issues.

ORS has a referral, liaison, and consultative relationship with the CRPs and funds a continuum of Supported Employment services, through the customer-selected CRP, that are expected to culminate in competitive integrated employment outcomes. Supported employment services are available after job placement.  As a leader, trainer, and funding source of supported employment services, ORS engages CRPs who rely on BHDDH funding to provide the long-term supports that help sustain employment for individuals with behavioral health disabilities. Natural supports from an employer or others can and should be identified and utilized as available.

For the past two years, ORS has collaborated with the BHDDH to work towards increasing the utilization of ORS and Medicaid funding for employment services. ORS and BH jointly met with the local Mental Health Agencies to consult and discuss potential referrals and services. ORS and BH have jointly participated in Individual Placement and Support (IPS) Training and are consulting with agencies who also utilize that model for Competitive Integrated Employment.

The objective of the SE services is in competitive integrated employment as an outcome, and for VR, at a minimum of ten hours per week at commensurate wages. Long-term supports are planned for and included in the customers’ ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and duration of each Supported Employment service; however, the Rehabilitation Act provides for time limits in WIOA for SE services. The IPE also identifies the CRP accepting responsibility to provide long-term and intermittent support services to the individual with a disability. The time frame for transitioning an individual from supported employment services to extended services is based upon the individual needs of each consumer. ORS may fund up to 24 months of supported employment services to individuals with the most significant disabilities following placement on the job if no other funding source for the long-term supports is identified. Including the provision of up to 24 months of supported employment services, ORS may provide up to four years of extended services to youth up to age 25 after the transition to extended services; however, ORS may not provide extended services to anyone other than these youth, which must be provided by CRPs or other sources.  Natural supports from an employer or others can and should be identified and utilized as available.

##### 8. Other Federal, State, and local agencies and programs outside the workforce development system.

The Rhode Island Office of Rehabilitation Services (ORS) collaborates with programs and agencies providing services that will assist an individual with a disability to establish and reach an employment goal. Types of agencies that ORS collaborates with include:  hospitals, medical and disability support organizations, educational institutions (both public and private), professional associations, domestic violence and homeless shelters, community centers, community mental health agencies, local educational authorities, substance abuse treatment facilities, private medical offices, state agencies, federal agencies, community employers, private businesses, and advocacy groups.

Memorandums of Understanding (MOU)/Cooperative Agreements (CA) have been negotiated with Department of Veterans Affairs (VA), Institutions of Higher Education (IHE - Rhode Island College, University of Rhode Island, and Community College of Rhode Island), Rhode Island Department of Labor and Training (DLT), Mashantucket Pequot Tribal Nation, Workforce Partnership of Greater Rhode Island, Cranston/Providence Workforce Development, and the Rhode Island Department of Health (DOH). The MOU/CA between ORS and the Rhode Island Department of Education (RIDE) has been completed and signed with RSA advisory to ensure that the new MOU be revised to meet the federal standards.

In order to enhance the recruitment of qualified rehabilitation counselors, ORS has a Memorandum of Understanding with Assumption College and Salve Regina University to provide practicum and internship opportunities to graduate level Rehabilitation Counseling students.

ORS has cultivated a strong working relationship with the State’s independent living center to augment the services provided by ORS.   Rhode Island has one IL center that provides support services, advocacy services, home assessments, independent living skills/assistive technology assessment, and information and referral services to adults, out-of-school, and in-school youth.

##### 9. Other private nonprofit organizations.

An identified need, as determined by the Statewide Comprehensive Needs Assessment (CNA), labor market information, or by the individualized needs of customers, will initiate efforts to create a new service or training option. ORS relies on a fee-for-service outcome-based fee structure with a network of private vocational community rehabilitation providers (CRPs) in order to meet the vocational rehabilitation needs of its customers. The ORS Fee-for-Service structure provides a means of evaluating and monitoring the quality of deliverables as agency-generated authorizations to the CRP/vendor, reports, outcomes, and client satisfaction are variables involved in payment for client services.

A prospective Community Rehabilitation Provider (CRP) or vendor completes an application, is vetted through the state Department of Accounts and Control, the federal System for Award Management (SAM) website, and the Secretary of State prior to approval by ORS.

CRPs/vendors requesting approval to provide services on fee-for-service basis will be evaluated based on ORS’s need for that service/training. ORS examines the geographic, population specific, labor market, and /or training content need of the agency based on CNA, and/or client feedback. ORS also reviews the Department of Labor and Training’s ETPL (Eligibility Training Provider List) annually to ensure DLT’s and ORS’s training fees are consistent.   Based on these findings, in addition to the results of the core partner strategic planning sessions, ORS identifies service/training expansion needs and may approve a new service/training vendor (after completing the vetting process) on a trial basis or not approve the service/training. Pilot programs are often used with new or existing vendors, and provide an opportunity to develop, monitor and evaluate if a service delivery model (designed to meet the rehabilitation needs of a specific disability group) is effective prior to committing long term to the service. A pilot offers the opportunity to make appropriate changes to ensure a positive outcome from a new initiative.

The DOJ/State Consent Decree has added additional requirements to the approval process of CRPs who are working with youth and adults with I/DD:

* CRP staff must meet certain baseline credentialing criteria to provide Job Coaching and Job Development services to customers with significant intellectual disabilities; and,
* CRPs providing Supported Employment Services must participate in a Continuous Quality Improvement review periodically.

#### 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:

**The VR agency must select the “Edit” button to review and agree to the VR State plan Assurances.**

| The State Plan must include |
| --- |
| 1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act. |
| 2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a Unified State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140. |
| 3. Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: |
| 3.a. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act. |
| 3.b. either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. |
| 3.c. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act. |
| 3.d. the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3). |
| 3.e. 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. |
| 3.f. as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. |
| 3.g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. |
| 3.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. |
| 3.i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act. |
| 3.j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act. |
| 3.k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act. |
| 3.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). |
| 3.m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act. |
| 4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will: |
| 4.a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act. |
| 4.b. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act. |
| 4.c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services 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. |
| 4.d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act. |
| 4.e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act. |
| 4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act |
| 4.g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act. |
| 4.h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 of the Rehabilitation Act. |
| 4.i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs. |
| 4.j. With respect to students with disabilities, the State, |
| 4.j.i. has developed and will implement, |
| 4.j.i.A. strategies to address the needs identified in the assessments; and |
| 4.j.i.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 |
| 4.j.ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25) and 113). |
| 4.j.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. Program Administration for the Supported Employment Title VI Supplement to the State plan: |
| 5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act. |
| 5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act. |
| 6. Financial Administration of the Supported Employment Program (Title VI): |
| 6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(H) and (I) of the Rehabilitation Act. |
| 6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act. |
| 7. Provision of Supported Employment Services: |
| 7.a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act. |
| 7.b. The designated State agency assures that 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. |

Do you attest that these assurances will be met?  
Yes

#### Vocational Rehabilitation (Combined or General) Certifications

States must provide written and signed certifications that:

##### 1. The (enter the name of designated State agency or designated State unit, as appropriate,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by title IV of WIOA[1], and its State Plan supplement under title VI of the Rehabilitation Act;

[1] Public Law 113-128.

###### Enter the name of designated State agency or designated State unit, as appropriate

Office of Rehabilitation Services

##### 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 (designated State agency or the designated State unit when the designated State agency has a designated State unit)[2]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[3], the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations[4], 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;

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] 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.

[4] 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 C.F.R. part 361.

###### Enter the name of designated State agency

Rhode Island Department of Human Services

##### 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[5], the Rehabilitation Act, and all applicable regulations[6], 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;

[5] 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.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

##### 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 the name of authorized representative below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;

###### Enter the name of authorized representative below

Joseph F. Murphy

##### 8. The (enter the title of authorized representative below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;

###### Enter the title of authorized representative below

Associate Director

##### 9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

##### Footnotes

[1] Public Law 113-128.

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] 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.

[4] 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 C.F.R. part 361.

[5] 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.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

##### Certification Signature

**To review and complete the Certification section of the VR portion of the State plan, please select the “Edit” button.**

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open [this link to the blank table](file:///C:\node\578531). You can copy and paste the table into the narrative field, and start over if needed.

| Signatory information | Enter Signatory information in this column |
| --- | --- |
| **Name of Signatory** | Joseph Murphy |
| **Title of Signatory** | Associate Director |
| **Date Signed** | January 5, 2024 |
|  |  |

#### Vocational Rehabilitation Program Performance Indicators

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan’s approval (section 116(b)(3)(A)(iv) of WIOA).

**Effectiveness in Serving Employers**

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

| Performance Indicators | PY 2024 Expected Level | PY 2024 Negotiated Level | PY 2025 Expected Level | PY 2025 Negotiated Level |
| --- | --- | --- | --- | --- |
| Employment (Second Quarter After Exit) | 48.6 | 48.6 | 49.6 | 49.6 |
| Employment (Fourth Quarter After Exit) | 45.1 | 45.1 | 46.1 | 46.1 |
| Median Earnings (Second Quarter After Exit) | 3,549.00 | 3,549.00 | 3,645.00 | 3,645.00 |
| Credential Attainment Rate | 33.7 | 33.7 | 34.8 | 34.8 |
| Measurable Skill Gains | 40.5 | 40.5 | 42.0 | 42.0 |
| Effectiveness in Serving Employers | Not Applicable [1](#footnote-1) | Not Applicable [1](#footnote-1) | Not Applicable [1](#footnote-1) | Not Applicable [1](#footnote-1) |

*1*

*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.*

#### GEPA 427 Form Instructions for Application Package - Vocational Rehabilitation

**EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES**

OMB Control Number 1894-0005 Expiration 02/28/2026

**Section 427 of the General Education Provisions Act (GEPA)** ([20 U.S.C. 1228a](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

**GEPA Section 427 Form Instructions for State Applicants**

**State applicants must respond to the following four questions:**

1. Describe how your entity’s existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

4. What is your timeline, including targeted milestones, for addressing these identified barriers?

• Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.

• Applicants use the associated text box to respond to each question.  However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans.  In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.

• Applicants are not required to have mission statements or policies that align with equity to apply.

• Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.

• Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to [GEPA 427 - Form Instructions for Application Package](https://wioaplans.ed.gov/node/584561)

##### 1. Describe how your entity’s existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

***Section 427 of the General Education Provisions Act (GEPA)****(*[*20 U.S.C. 1228a*](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)*) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

[*GEPA 427 - Form Instructions for Application Package*](https://wioaplans.ed.gov/node/584561)

***State applicants must respond to four questions.***

***The first of four questions is:***

*Describe how your entity’s existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.*

A Division of the Rhode Island Department of Human Services, the Rhode Island Office of Rehabilitation Services Vocational Rehabilitation (VR) Program is the public state and federally funded program that assists individuals with disabilities to choose, prepare for, obtain, and maintain employment. Employment being the successful outcome of services provided through the public vocational rehabilitation program. It is expected that individuals with disabilities who apply for services are interested in becoming employed and understand that this is the focus of the VR program.

Our mission is to empower individuals with disabilities to choose, prepare for, obtain, advance in, and maintain employment, economic self-sufficiency, independence, and integration into society.  Through this mission the  Rhode Island Office of Rehabilitation is committed to ensuring equity in the provision of services to individuals with disabilities, including those students with disabilities attending secondary education as outlined in the Rehabilitation Services Administration CFR-34 rules and regulations around vocational rehabilitation programs.

Following in our parent agency, RI Department of Human Services, ORS believes that all Rhode Islands have the opportunity to thrive at home, work and in the community.  In doing so, ORS follows the guiding principles listed below:

* Right Service, Right Place:  Effective triage is fundamental to serving customers as quickly as possible.
* Champion “The Easy Way”:  Customers should be rewarded for being proactive, coming prepared, and using preferred channels.
* Preventions > Correction:  Breaking the cycle of churn requires greater efforts up front to avoid unnecessary closures.
* Clear Message, Warm Voice:  In every communication or interactions, customers should feel welcome, respected and understood.
* Keep Customers in the Loop:  Make extraordinary efforts to let customers know the status at any given time.
* Inspire Confidence:  Highlight when things go well in order to rebuild trust with employees and customers and build a culture of excellence.
* Decide with Data:  The data to inform decisions and track progress toward department program and service level goals.
* Commitment to Diversity, Equity, & Inclusion Excellence:  Acknowledge that systematic barriers exist and work together to eliminate them, promote change, show accountability, and embrace differences.
* Support the Whole Family:  Use a holistic, coordinated approach to ensure families have opportunities to achieve their goals and thrive.

##### 2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

***Section 427 of the General Education Provisions Act (GEPA)****(*[*20 U.S.C. 1228a*](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)*) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

[GEPA 427 - Form Instructions for Application Package](https://wioaplans.ed.gov/node/584561)

***State applicants must respond to four questions.***

***The second of four questions is:***

*Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?*

Barriers that may impede equitable access to the activities of the ORS Title I and Title VI grants for the duration of the grant period include:

1.  Recruitment and retention of qualified Vocational Rehabilitation Counselors, including VRCs with disabilities, diverse backgrounds, and cultural competence to meet the needs of Program participants.

2.  Vendor/service provider challenges with staffing and retention of staff to provide services.

3.  Ensuring written materials are available in various languages.

4.  Ensuring written materials/forms are written in inclusive language.

5.  Recruiting additional bilingual staff.

##### 3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

***Section 427 of the General Education Provisions Act (GEPA)****(*[*20 U.S.C. 1228a*](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)*) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

[*GEPA 427 - Form Instructions for Application Package*](https://wioaplans.ed.gov/node/584561)

***State applicants must respond to four questions.***

***The third of four questions is:***

*Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?*

ORS will ensure materials will meet the needs of populations being served and/or outreached to.

ORS will partner with Dorcas Place International to identify and outreach underserved populations and identify specific needs.

ORS will review data and determine alternate formats for underserved populations.

ORS will continue to have representation on both the Department of Human Services (DHS) Diversity, Equity, & Inclusion (DEI) Committee, as well as the ORS DEI Committee.

ORS will continue in the Comprehensive State Needs Assessment to place an emphasis on identifying who we are not serving and the barriers to accessing our services.  This assessment will begin in FFY2024/25

In addition, ORS will:

* Identify areas of training needs for Community Rehabilitation Programs (CRPs) and implement training opportunities to improve services with an aim on best practice, identifying barriers and solutions.
* Conduct quarterly VR meetings with SE (DD and BH) vendors to reinforce and strengthen Employment First principles and practices.
* Support, facilitate, and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings to create opportunities for community of practice, creative problem-solving, information dissemination and training.
* Conduct liaison training to ORS VRC’s and CRP’s on annual basis to develop and improve the relationships between ORS and CRP’s.
* Encourage vendors to provide a full continuum of VR services and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of full continuum of services.
* Examine and modify, as needed and at least annually, the VR fee structure to ensure it rewards integrated employment outcomes and assists with eliminating barriers.
* Continue to offer Virtual Service delivery options.

##### 4. What is your timeline, including targeted milestones, for addressing these identified barriers?

***Section 427 of the General Education Provisions Act (GEPA)****(*[*20 U.S.C. 1228a*](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)*) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

[*GEPA 427 - Form Instructions for Application Package*](https://wioaplans.ed.gov/node/584561)

***State applicants must respond to four questions.***

***The final of four questions is:***

*What is your timeline, including targeted milestones, for addressing these identified barriers?*

The timeline for addressing identified barriers or issues of non-compliance will be addressed over the course of this program year.

All staff are required to complete annually the Complicit Bias course, Diversity, Equity, & Inclusion diversity classes, and Civil Rights Training.

On a bi-annual basis, Department of Human Services (DHS) has an employee come to ORS to ensure signage is accurate, in various languages, etc.

Over next program year, ORS will be reviewing materials/forms to ensure they are revised in an inclusive language.

#### GEPA 427 Form Instructions for Application Package - Supported Employment

**EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES**

OMB Control Number 1894-0005 Expiration 02/28/2026

**Section 427 of the General Education Provisions Act (GEPA)** ([20 U.S.C. 1228a](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

**GEPA Section 427 Form Instructions for State Applicants**

**State applicants must respond to the following four questions:**

1. Describe how your entity’s existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

4. What is your timeline, including targeted milestones, for addressing these identified barriers?

• Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.

• Applicants use the associated text box to respond to each question.  However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans.  In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.

• Applicants are not required to have mission statements or policies that align with equity to apply.

• Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.

• Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to [GEPA 427 - Form Instructions for Application Package](https://wioaplans.ed.gov/node/584561)

##### 1. Describe how your entity’s existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

***Section 427 of the General Education Provisions Act (GEPA)****(*[*20 U.S.C. 1228a*](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)*) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

[*GEPA 427 - Form Instructions for Application Package*](https://wioaplans.ed.gov/node/584561)

***State applicants must respond to four questions.***

***The first of four questions is:***

*Describe how your entity’s existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.*

SUPPORTED EMPLOYMENT

A Division of the Rhode Island Department of Human Services, the Rhode Island Office of Rehabilitation Services Vocational Rehabilitation (VR) Program is the public state and federally funded program that assists individuals with disabilities to choose, prepare for, obtain, and maintain employment. The ORS Supported Employment program assists individuals with the most significant disabilities who have been unsuccessful with traditional employment strategies, and need ongoing supports, to choose, find, and keep employment.

Our mission is to empower individuals with disabilities to choose, prepare for, obtain, advance in, and maintain employment, economic self-sufficiency, independence, and integration into society.   Through this mission the Rhode Island Office of Rehabilitation is committed to ensuring equity in the provision of services to individuals with disabilities, including those individuals with the most significant disabilities, as outlined in the Rehabilitation Services Administration CFR-34 rules and regulations around vocational rehabilitation/supported employment programs.

Following in our parent agency, RI Department of Human Services, ORS believes that all Rhode Islands have the opportunity to thrive at home, work and in the community.  In doing so, ORS follows the guiding principles listed below:

* Right Service, Right Place:  Effective triage is fundamental to serving customers as quickly as possible.
* Champion “The Easy Way”:  Customers should be rewarded for being proactive, coming prepared, and using preferred channels.
* Preventions > Correction:  Breaking the cycle of churn requires greater efforts up front to avoid unnecessary closures.
* Clear Message, Warm Voice:  In every communication or interactions, customers should feel welcome, respected and understood.
* Keep Customers in the Loop:  Make extraordinary efforts to let customers know the status at any given time.
* Inspire Confidence:  Highlight when things go well in order to rebuild trust with employees and customers and build a culture of excellence.
* Decide with Data:  The data to inform decisions and track progress toward department program and service level goals.
* Commitment to Diversity, Equity, & Inclusion Excellence:  Acknowledge that systematic barriers exist and work together to eliminate them, promote change, show accountability, and embrace differences.
* Support the Whole Family:  Use a holistic, coordinated approach to ensure families have opportunities to achieve their goals and thrive.

##### 2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

***Section 427 of the General Education Provisions Act (GEPA)****(*[*20 U.S.C. 1228a*](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)*) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

[GEPA 427 - Form Instructions for Application Package](https://wioaplans.ed.gov/node/584561)

***State applicants must respond to four questions.***

***The second of four questions is:***

*Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?*

SUPPORTED EMPLOYMENT

Barriers that may impede equitable access to the activities of the ORS Title VI grants for the duration of the grant period include:

1. Recruitment and retention of qualified Vocational Rehabilitation Counselors, including VRCs with disabilities, diverse backgrounds, and cultural competence to meet the needs of Program participants.
2. Vendor/service provider challenges with staffing and retention of staff to provide services.
3. Ensuring written materials are available in various languages.
4. Ensuring written materials/forms are written in inclusive language.
5. Recruiting additional bilingual staff.

##### 3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

***Section 427 of the General Education Provisions Act (GEPA)****(*[*20 U.S.C. 1228a*](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)*) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

[*GEPA 427 - Form Instructions for Application Package*](https://wioaplans.ed.gov/node/584561)

***State applicants must respond to four questions.***

***The third of four questions is:***

*Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?*

SUPPORTED EMPLOYMENT

* ORS will ensure materials will meet the needs of populations being served and/or outreached to.
* ORS will partner with Dorcas Place International to identify and outreach underserved populations and identify specific needs.
* ORS will review data and determine alternate formats for underserved populations.
* ORS will continue to have representation on both the Department of Human Services (DHS) Diversity, Equity, & Inclusion (DEI) Committee, as well as the ORS DEI Committee.
* ORS will continue in the Comprehensive State Needs Assessment to place an enfaces on identifying who we are not serving and the barriers to accessing our services.  This assessment will begin in FFY2024/25.

In addition, ORS will:

* Identify areas of training needs for Community Rehabilitation Programs (CRPs) and implement training opportunities to improve services with an aim on best practice, identifying barriers and solutions.
* Conduct quarterly VR meetings with SE (DD and BH) vendors to reinforce and strengthen Employment First principles and practices.
* Support, facilitate, and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings to create opportunities for community of practice, creative problem-solving, information dissemination and training.
* Conduct liaison training to ORS VRC’s and CRPs on annual basis to develop and improve the relationships between ORS and CRPs.
* Encourage vendors to provide a full continuum of VR services and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of full continuum of services.
* Examine and modify, as needed and at least annually, the VR fee structure to ensure it rewards integrated employment outcomes and assists with eliminating barriers.
* Continue to offer Virtual Service delivery options.

##### 4. What is your timeline, including targeted milestones, for addressing these identified barriers?

***Section 427 of the General Education Provisions Act (GEPA)****(*[*20 U.S.C. 1228a*](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)*) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

[*GEPA 427 - Form Instructions for Application Package*](https://wioaplans.ed.gov/node/584561)

***State applicants must respond to four questions.***

***The final of four questions is:***

*What is your timeline, including targeted milestones, for addressing these identified barriers?*

The timeline for addressing identified barriers or issues of non-compliance will be addressed over the course of this program year.

All staff are required to complete annually the Complicit Bias course, Diversity, Equity, & Inclusion diversity classes, and Civil Rights Training.

On a bi-annual basis, Department of Human Services (DHS) has an employee come to ORS to ensure signage is accurate, in various languages, etc.

Over next program year, ORS will be reviewing materials/forms related to Supported Employment to ensure they are revised in an inclusive language.

## VII. Program-Specific Requirements for Combined State Plan Partner Programs

States choosing to submit a Combined State Plan must  provide information concerning the six core programs—the Adult program, Dislocated Worker program, Youth program, Wagner-Peyser Act program, Adult Education and Family Literacy Act program, and the Vocational Rehabilitation program— and also submit relevant information for any of the eleven partner programs it elects to include in its Combined State Plan.   When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. 24 If included, Combined State Plan partner programs are subject to the “common planning elements” in Sections II-IV of this document, where specified, as well as the program-specific requirements for that program.   
  
[24] States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C.  9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

### Career and technical education programs authorized under the 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) (Title 20, United States Code (20 U.S.C. 2301 et seq.))

**NOTE:** Unless otherwise noted, statutory references in this section are to Pub. L. 115–224,— *The Strengthening Career and Technical Education for the 21st Century Act* (“Perkins V” or “the Act”). (20 U.S.C. 2301 et seq.) The term “the State” used throughout this section refers to the State Perkins Eligible Agency and “the State Plan” refers to the “Perkins State Plan”.

(OMB Control Number: 1830-0029)

#### a. Plan Development and Consultation

1. Describe how the State plan was developed in consultation with the stakeholders and in accordance with the procedures in section 122(c)(2) of Perkins V. See Text Box 1 for the statutory requirements for State plan consultation under section 122(c)(1) of Perkins V.
2. Consistent with section 122(e)(1) of Perkins V, each eligible agency must develop the portion of the State plan relating to the amount and uses of any funds proposed to be reserved for adult career and technical education, postsecondary career and technical education, and secondary career and technical education after consultation with the State agencies identified in section 122(e)(1)(A)-(C) of the Act. If a State agency, other than the eligible agency, finds a portion of the final State plan objectionable, the eligible agency must provide a copy of such objections and a description of its response in the final plan submitted to the Secretary. (Section 122(e)(2) of Perkins V)
3. Describe opportunities for the public to comment in person and in writing on the State plan. (Section 122(d)(14) of Perkins V)

| Text Box 1: Statutory Requirements for State Plan Consultation |
| --- |
| * (c) PLAN DEVELOPMENT.— * (1) IN GENERAL.—The eligible agency shall—   + (A) Develop the State plan in consultation with—     - (i) Representatives of secondary and postsecondary career and technical education programs, including eligible recipients and representatives of 2-year minority serving institutions and historically Black colleges and universities and tribally controlled colleges or universities in States where such institutions are in existence, adult career and technical education providers, and charter school representatives in States where such schools are in existence, which shall include teachers, faculty, school leaders, specialized instructional support personnel, career and academic guidance counselors, and paraprofessionals;     - (ii) Interested community representatives, including parents, students, and community organizations;     - (iii) Representatives of the State workforce development board established under section 101 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3111) (referred to in this section as the ‘‘State board’’);     - (iv) Members and representatives of special populations;     - (v) Representatives of business and industry (including representatives of small business), which shall include representatives of industry and sector partnerships in the State, as appropriate, and representatives of labor organizations in the State;     - (vi) Representatives of agencies serving out-of-school youth, homeless children and youth, and at-risk youth, including the State Coordinator for Education of Homeless Children and Youths established or designated under section 722(d)(3) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11432(d)(3));     - (vii) Representatives of Indian Tribes and Tribal organizations located in, or providing services in, the State; and     - (viii) Individuals with disabilities; and   + (B) Consult the Governor of the State, and the heads of other State agencies with authority for career and technical education programs that are not the eligible agency, with respect to the development of the State plan. * (2) ACTIVITIES AND PROCEDURES.—The eligible agency shall develop effective activities and procedures, including access to information needed to use such procedures, to allow the individuals and entities described in paragraph (1) to participate in State and local decisions that relate to development of the State plan. (3) CONSULTATION WITH THE GOVERNOR.—The consultation described in paragraph (1)(B) shall include meetings of officials from the eligible agency and the Governor’s office and shall occur—   + (A) During the development of such plan; and   + (B) Prior to submission of the plan to the Secretary.   (Section 122(c)(1) of Perkins V) |

**Glossary of Key Terms and Abbreviations**

* AP – Advanced Placement
* CCRI – Community College of Rhode Island
* CLNA – Comprehensive Local Needs Assessment
* CTE – Career and Technical Education
* CTE Board – Career and Technical Education Board of Trustees
* CTSO – Career and Technical Student Organization
* DLT – Department of Labor and Training
* GO – Governor’s Office
* GWB – Governor’s Workforce Board
* ELL – English Language Learner
* ESSA – Every Student Succeeds Act
* FY – Fiscal Year
* ILP – Individual Learning Plan
* LEA – Local Education Authority
* OPC – Office of the Postsecondary Commissioner
* PD – Professional Development
* Perkins V – The Strengthening Career and Technical Education for the 21st Century Act
* PrepareRI – Prepare Rhode Island
* RIDE – Rhode Island Department of Elementary and Secondary Education
* WBL – Work-Based Learning
* WIB – Workforce Investment Board (WIB)
* WIOA – Workforce Innovation and Opportunity Act

**II.A.1. Describe how the State plan was developed in consultation with the stakeholders and in accordance with the procedures in section 122(c)(2) of Perkins V and as provided in Text Box 1 on the following page.**

In the summer of 2019, RIDE and the Career and Technical Education Board of Trustees (CTE Board) hosted seven stakeholder meetings totaling over 20 hours of in-person discussion with diverse groups of stakeholders, including specific invitations to each of the representatives of stakeholder groups named in section 122(c)(2) of Perkins V.

Key Questions

These meetings were organized around RI’s established key questions for the State Plan development, as outlined in Rhode Island’s FY20 transition plan:

State Alignment: How can Rhode Island align its PK-20 workforce development initiatives? This includes, but is not limited to, aligning Prepare Rhode Island (PrepareRI) to career and technical education (CTE) and the needs of Rhode Island’s employers.

Secondary to Postsecondary Transition: How can Rhode Island increase alignment between secondary and postsecondary CTE programs, particularly the Perkins-grant-eligible Community College of Rhode Island?

Middle School: How can and should Rhode Island increase career awareness, exploration, and programming in our earlier grades?

Funding: How can Rhode Island strengthen our Perkins grant distribution models and leverage additional sources of funding to align with state goals for CTE and meet employer needs, as established by the CTE Board?

Equity: How can Rhode Island increase the participation and outcomes of underrepresented student groups in CTE programs?

Careers in Priority Sectors: How should Rhode Island’s CTE system prepare students for the future of work and recognize high-skill, high-growth industries, emerging industries, and industries that are not identified as either?

Measuring Program Success: How can Rhode Island continue to improve upon our system to hold our state and grantees accountable for ensuring students are graduating high school and postsecondary institutions prepared for career success and ready to meet the needs of industry?

Stakeholder Meetings

RIDE and the CTE Board hosted seven meetings across the state to engage as many stakeholders as possible and to provide multiple opportunities for feedback as the state plan continued to evolve. Meetings were held over the course of four months (June - October 2019) and throughout the planning process to ensure stakeholder feedback was integral to the plan’s development.  These meetings were advertised in the Commissioner’s Field Memo and the PrepareRI Newsletter—which collectively reach over 23,100 people—and through direct communication with CTE programs.

The schedule and meeting topics were:

June 27: Introduction to the Planning Process & Application Guidelines

July 11: Secondary Programs

July 18: Postsecondary Programs

August 22: Academic & Workforce Readiness

August 29: Funding Sources, Part 1

September 12: Funding Sources, Part 2

October 3: Presentation of Draft Plan (focusing on program requirements, measuring success, and funding sources)

Attendees represented a variety of stakeholder groups, including district and school leadership, CTE centers, community and industry partners, as well as business leaders and members of the CTE Board. Materials were sent via email to everyone who had signed up to receive Perkins V notifications, in case they were not able to attend.

Each meeting began with introductory remarks, including “partnership spotlights” of successful partnerships between industry and schools. These spotlights helped to highlight exemplary models that other schools could replicate and shine a light on successes from the field. They also provided an opportunity for employers to articulate their support for CTE and to share their future workforce needs.

Half of each meeting was a background presentation. Representatives from RIDE provided a summary of the key information needed to make the policy decision under discussion. This usually included a summary of existing policies, relevant outside federal or state policies, and data on the current landscape.

After the background section, RIDE presented the key policy question and a set of policy options. For example, the question for one meeting was “How should RIDE distribute Perkins funds to schools and districts?” and the policy options included different approaches to using consortia to receive Perkins funds.

After these presentations, the second half of the meeting was organized around small-group policy discussions. Attendees were broken into small groups with a facilitator, and discussed the policy question and options presented. The facilitators took detailed notes, which were then compiled and tallied. This included qualitative feedback as well as rating each policy option from “Strongly Disagree” to “Strongly Agree.” The meeting structure was designed to maximize attendee participation with the use of both large group presentations and facilitated small group feedback sessions. The structure allowed time for attendees to provide feedback in small groups, providing for space for multiple voices to be heard.

After each meeting, RIDE compiled feedback from the small group discussion and surveys. This information was used to revise the policy recommendation in the State Plan. This recommendation was then presented at the subsequent stakeholder meeting and incorporated into the State Plan draft.

Incorporating Feedback

In addition to the stakeholder meetings described above, RIDE released six surveys throughout the summer focusing on key policy questions and proposals aligned to the questions above. These surveys were released statewide after each stakeholder meeting. The results of each survey were then shared at the subsequent stakeholder meeting.

Feedback from the plan was debriefed during weekly meetings of the PrepareRI Core Team, which consists of representatives of the Rhode Island agencies responsible for state education and workforce strategy, including: the Rhode Island Department of Elementary and Secondary Education (RIDE), Governor’s Workforce Board (GWB), Department of Labor and Training (DLT), Rhode Island Commerce, Governor’s Office, Office of the Postsecondary Commissioner (OPC), and Community College of Rhode Island (CCRI). These meetings also facilitated the coordination of alignment between the development of the Perkins Plan and the Workforce Innovation and Opportunity Act (WIOA) Plan.

The plan was presented and discussed at monthly CTE Board meetings, from September 2019 through February 2020. The CTE Board consists of representatives from private industry, labor, trade associations, government, K-12 schools, RIDE, postsecondary, adult education, economic development, and the Governor’s Workforce Board. RIDE solicited feedback from members of the Board to revise the plan.

Including the in-person meetings and surveys, Rhode Island gathered and analyzed over 5,000 feedback statements to inform the development of the draft plan. Data shows that respondents included representatives of all stakeholder groups named in the Perkins consultation list.

To make it easier for all stakeholders to understand the key changes in the Perkins plan, RIDE created a two-page summary of the major changes under Perkins V. This document was posted on the RIDE website, and sent out to the field in both the Commissioner’s Field Memo (which goes out to more than 21,000 people across the state, including all superintendents, principals, and teachers) and the PrepareRI newsletter (which goes out to 1,166 people across the state, including leaders from schools, businesses, and non-profits).

CTE Board Endorsement

The plan was also discussed at the monthly meetings of the CTE Board. The plan was formally endorsed by the CTE Board on February 7, 2020.

Public Comment

Following the development of the draft plan, RIDE released the plan for a formal public comment period of 30 days. During this time, RIDE held two formal public comment sessions with 14 participants and collected nine online survey responses. Most CTE stakeholders that talked with RIDE during this period said that they already knew the plan and had shared their feedback during the stakeholder meetings and CTE Board meetings, and they therefore felt no need to add formal public comment. Upon closing the public comment session, RIDE analyzed the comments and made some clarifications to the plan to address the feedback received.

The plan was provided to the Governor for her review and endorsement on March 14, 2020. The Governor’s letter of endorsement can be found as Appendix A.

**II.A.2. Consistent with section 122(e)(1) of Perkins V, each eligible agency must develop the portion of the State plan relating to the amount and uses of any funds proposed to be reserved for adult career and technical education, postsecondary career and technical education, and secondary career and technical education after consultation with the State agencies identified in section 122(e)(1)(A)-(C) of the Act.  If a State agency, other than the eligible agency, finds a portion of the final State plan objectionable, the eligible agency must provide a copy of such objections and a description of its response in the final plan submitted to the Secretary.  (Section 122(e)(2) of Perkins V).**

RIDE serves as the administrative entity for Perkins secondary, postsecondary, and adult education. RIDE serves as the primary policy-making entity for all these areas. Therefore, the State Plan does not require consultation with any other state agency in the areas of adult, postsecondary, and adult education. Nonetheless, RIDE included the Governor’s Workforce Board (GWB), the Office of Postsecondary Commissioner, the Community College of Rhode Island (CCRI), and the Governor’s Office in the ongoing refinements of the plan, through the weekly PrepareRI Core Team meetings. RIDE has also coordinated with the CTE Board, as it has statutory responsibilities related to CTE.

June 2, 2023 - The requested change to the Rhode Island Perkins V State Plan noted that RIDE opted to drop two of the optional performance metrics (5S4 and 5S5) as data collection and processing did not align with the Perkins V CAR submission timeline.  To avoid an ongoing delay due to these factors the state opted to drop two optional metrics.  Stakeholders were informed and there was no response to public comment.

**II.A.3. Describe opportunities for the public to comment in person and in writing on the State plan.  (Section 122(d)(14) of Perkins V)**

Following the development of the draft plan, RIDE released the plan for a formal public comment period of 30 days. During this time, RIDE and the CTE Board of Trustees hosted two formal public comment sessions to summarize the changes in the state plan, and received feedback. The public comment sessions had 14 attendees who shared zero responses. (Most CTE staff and attendees at the sessions noted that they were already familiar with the plan from the stakeholder engagement sessions and the CTE Board presentations on Perkins V.) RIDE also administered an online survey with nine responses.  
Key takeaways from those sessions were shared at the following CTE Board meetings, PrepareRI Core Team meetings, and have been incorporated into the final state plan. Most of the online survey responses voiced concern about admissions policies for some CTE programs creating equity gaps in access to the programs. This Perkins V plan addresses those concerns by requiring CTE programs to report their admissions policies to RIDE, as well as data on the admissions patterns of students in the programs. If there is evidence of a disproportionate impact on student subpopulations, then RIDE will work with programs to close those equity gaps.

#### b. Program Administration and Implementation

* 1. State’s Vision for Education and Workforce Development
  + a. Provide a summary of State-supported workforce development activities (including education and training) in the State, including the degree to which the State's career and technical education programs and programs of study are aligned with and address the education and skill needs of the employers in the State identified by the State workforce development board. (Section 122(d)(1) of Perkins V)
  + b. Describe the State's strategic vision and set of goals for preparing an educated and skilled workforce (including special populations) and for meeting the skilled workforce needs of employers, including in existing and emerging in-demand industry sectors and occupations as identified by the State, and how the State's career and technical education programs will help to meet these goals. (Section 122(d)(2) of Perkins V)
  + c. Describe the State’s strategy for any joint planning, alignment, coordination, and leveraging of funds between the State's career and technical education programs and programs of study with the State's workforce development system, to achieve the strategic vision and goals described in section 122(d)(2) of Perkins V, including the core programs defined in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102) and the elements related to system alignment under section 102(b)(2)(B) of such Act (29 U.S.C. 3112(b)(2)(B)); and for programs carried out under this title with other Federal programs, which may include programs funded under the Elementary and Secondary Education Act of 1965 and the Higher Education Act of 1965. (Section 122(d)(3) of Perkins V)
  + d. Describe how the eligible agency will use State leadership funds made available under section 112(a)(2) of Perkins V for each of the purposes under section 124(a) of the Act. See Text Box 2 for the required uses of State leadership funds under section 124(a) of Perkins V. (Section 122(d)(7) of Perkins V)

| Text Box 2: Required Uses of State Leadership Funds |
| --- |
| (a) GENERAL AUTHORITY.—  From amounts reserved under section 112(a)(2), each eligible agency shall—   * (1) Conduct State leadership activities to improve career and technical education, which shall include support for—   + (A) Preparation for non-traditional fields in current and emerging professions, programs for special populations, and other activities that expose students, including special populations, to high-skill, high-wage, and in-demand occupations;   + (B) Individuals in State institutions, such as State correctional institutions, including juvenile justice facilities, and educational institutions that serve individuals with disabilities;   + (C) Recruiting, preparing, or retaining career and technical education teachers, faculty, specialized instructional support personnel, or paraprofessionals, such as preservice, professional development, or leadership development programs; and   + (D) Technical assistance for eligible recipients; and   (2) Report on the effectiveness of such use of funds in achieving the goals described in section 122(d)(2) and the State determined levels of performance described in section 113(b)(3)(A), and reducing disparities or performance gaps as described in section 113(b)(3)(C)(ii)(II).  (Section 124 of Perkins V) |

* 2. Implementing Career and Technical Education Programs and Programs of Study
  + a. Describe the career and technical education programs or programs of study that will be supported, developed, or improved at the State level, including descriptions of the programs of study to be developed at the State level and made available for adoption by eligible recipients. (Section 122(d)(4)(A) of Perkins V)
  + b. Describe the process and criteria to be used for approving locally developed programs of study or career pathways (see Text Box 3 for the statutory definition of career pathways under section 3(8) of Perkins V), including how such programs address State workforce development and education needs and the criteria to assess the extent to which the local application under section 1321 1 will—
    - i. Promote continuous improvement in academic achievement and technical skill attainment;
    - ii. Expand access to career and technical education for special populations; and
    - iii. Support the inclusion of employability skills in programs of study and career pathways. (Section 122(d)(4)(B) of Perkins V)
  + c. Describe how the eligible agency will—
    - i. Make information on approved programs of study and career pathways (including career exploration, work-based learning opportunities, early college high schools, and dual or concurrent enrollment program opportunities) and guidance and advisement resources, available to students (and parents, as appropriate), representatives of secondary and postsecondary education, and special populations, and to the extent practicable, provide that information and those resources in a language students, parents, and educators can understand;
    - ii. Facilitate collaboration among eligible recipients in the development and coordination of career and technical education programs and programs of study and career pathways that include multiple entry and exit points;
    - iii. Use State, regional, or local labor market data to determine alignment of eligible recipients' programs of study to the needs of the State, regional, or local economy, including in-demand industry sectors and occupations identified by the State board, and to align career and technical education with such needs, as appropriate;
    - iv. Ensure equal access to approved career and technical education programs of study and activities assisted under this Act for special populations;
    - v. Coordinate with the State board to support the local development of career pathways and articulate processes by which career pathways will be developed by local workforce development boards, as appropriate;
    - vi. Support effective and meaningful collaboration between secondary schools, postsecondary institutions, and employers to provide students with experience in, and understanding of, all aspects of an industry, which may include work-based learning such as internships, mentorships, simulated work environments, and other hands-on or inquiry-based learning activities; and
    - vii. Improve outcomes and reduce performance gaps for CTE concentrators, including those who are members of special populations. (Section 122(d)(4)(C) of Perkins V)

| Text Box 3: Statutory Definition of Career Pathways |
| --- |
| The term ‘career pathways’ has the meaning given the term in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102)  (7) Career pathway.--The term "career pathway'' means a combination of rigorous and high-quality education, training, and other services that—   * (A) Aligns with the skill needs of industries in the economy of the State or regional economy involved; * (B) Prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the Act of August 16, 1937 (commonly known as the "National Apprenticeship Act''; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.) (referred to individually in this Act as an "apprenticeship'', except in section 171); * (C) Includes counseling to support an individual in achieving the individual's education and career goals; * (D) Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster; * (E) Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable; * (F) Enables an individual to attain a secondary school diploma or its recognized equivalent, and at least 1 recognized postsecondary credential; and * (G) Helps an individual enter or advance within a specific occupation or occupational cluster. (Section 3(7) of the Workforce Innovation and Opportunity Act [Public Law 113- 128])   (Section 3(8) of Perkins V) |

* d. Describe how the eligible agency, if it opts to do so, will include the opportunity for secondary school students to participate in dual or concurrent enrollment programs, early college high school, or competency-based education. (Section 122(d)(4)(D) of Perkins V)
* e. Describe how the eligible agency will involve parents, academic and career and technical education teachers, administrators, faculty, career guidance and academic counselors, local business (including small businesses), labor organizations, and representatives of Indian Tribes and Tribal organizations, as appropriate, in the planning, development, implementation, and evaluation of its career and technical education programs. (Section 122(d)(12) of Perkins V)
* f. Include a copy of the local application template that the eligible agency will require eligible recipients to submit pursuant to section 134(b) of Perkins V. See Text Box 4 for the statutory requirements for local applications under section 134(b) of Perkins V.
* g. Include a copy of the comprehensive local needs assessment template and/or guidelines that the eligible agency will require of eligible recipients to meet the requirements of section 134(c) of Perkins V. See Text Box 5 for the requirements for the comprehensive local needs assessment under section 134(c) of Perkins V.
* h. Provide the eligible agency’s definition for “size, scope, and quality” that will be used to make funds available to eligible recipients pursuant to section 135(b) of Perkins V.

| Text Box 4: Statutory Requirements of Local Applications |
| --- |
| * (b) CONTENTS.—The eligible agency shall determine the requirements for local applications, except that each local application shall contain— * (1) A description of the results of the comprehensive needs assessment conducted under subsection (c); * (2) Information on the career and technical education course offerings and activities that the eligible recipient will provide with funds under this part, which shall include not less than 1 program of study approved by a State under section 124(b)(2), including—   + (A) How the results of the comprehensive needs assessment described in subsection (c) informed the selection of the specific career and technical education programs and activities selected to be funded;   + (B) A description of any new programs of study the eligible recipient will develop and submit to the State for approval; and   + (C) How students, including students who are members of special populations, will learn about their school’s career and technical education course offerings and whether each course is part of a career and technical education program of study; * (3) A description of how the eligible recipient, in collaboration with local workforce development boards and other local workforce agencies, one-stop delivery systems described in section 121(e)(2) of the Workforce Innovation and Opportunity Act (29 U.S.C. 3151(e)(2)), and other partners, will provide—   + (A) Career exploration and career development coursework, activities, or services;   + (B) Career information on employment opportunities that incorporate the most up-to-date information on high-skill, high-wage, or in-demand industry sectors or occupations, as determined by the comprehensive needs assessment described in subsection (c); and   + (C) An organized system of career guidance and academic counseling to students before enrolling and while participating in a career and technical education program; * (4) A description of how the eligible recipient will improve the academic and technical skills of students participating in career and technical education programs by strengthening the academic and career and technical education components of such programs through the integration of coherent and rigorous content aligned with challenging academic standards and relevant career and technical education programs to ensure learning in the subjects that constitute a well-rounded education (as defined in section 8101 of the Elementary and Secondary Education Act of 1965); * (5) A description of how the eligible recipient will—   + (A) Provide activities to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations that will lead to self-sufficiency;   + (B) Prepare CTE participants for non-traditional fields;   + (C) Provide equal access for special populations to career and technical education courses, programs, and programs of study; and   + D) Ensure that members of special populations will not be discriminated against on the basis of their status as members of special populations; * (6) A description of the work-based learning opportunities that the eligible recipient will provide to students participating in career and technical education programs and how the recipient will work with representatives from employers to develop or expand work-based learning opportunities for career and technical education students, as applicable; * (7) A description of how the eligible recipient will provide students participating in career and technical education programs with the opportunity to gain postsecondary credit while still attending high school, such as through dual or concurrent enrollment programs or early college high school, as practicable; * (8) A description of how the eligible recipient will coordinate with the eligible agency and institutions of higher education to support the recruitment, preparation, retention, and training, including professional development, of teachers, faculty, administrators, and specialized instructional support personnel and paraprofessionals who meet applicable State certification and licensure requirements (including any requirements met through alternative routes to certification), including individuals from groups underrepresented in the teaching profession; and * (9) A description of how the eligible recipient will address disparities or gaps in performance as described in section 113(b)(3)(C)(ii)(II) in each of the plan years, and if no meaningful progress has been achieved prior to the third program year, a description of the additional actions such recipient will take to eliminate those disparities or gaps.   (Section 134(b) of Perkins V) |
| Text Box 5: Statutory Requirements for Comprehensive Local Needs Assessment |
| * (c) COMPREHENSIVE NEEDS ASSESSMENT.— * (1) IN GENERAL.—To be eligible to receive financial assistance under this part, an eligible recipient shall—   + (A) Conduct a comprehensive local needs assessment related to career and technical education and include the results of the needs assessment in the local application submitted under subsection (a); and   + (B) Not less than once every 2 years, update such comprehensive local needs assessment. * (2) REQUIREMENTS.—The comprehensive local needs assessment described in paragraph   + (1) Shall include each of the following:   + (A) An evaluation of the performance of the students served by the eligible recipient with respect to State determined and local levels of performance established pursuant to section 113, including an evaluation of performance for special populations and each subgroup described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965.   + (B) A description of how career and technical education programs offered by the eligible recipient are—(i) sufficient in size, scope, and quality to meet the needs of all students served by the eligible recipient; and (ii)(I) aligned to State, regional, Tribal, or local in-demand industry sectors or occupations identified by the State workforce development board described in section 101 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3111) (referred to in this section as the ‘‘State board’’) or local workforce development board, including career pathways, where appropriate; or (II) designed to meet local education or economic needs not identified by State boards or local workforce development boards.   + (C) An evaluation of progress toward the implementation of career and technical education programs and programs of study.   + (D) A description of how the eligible recipient will improve recruitment, retention, and training of career and technical education teachers, faculty, specialized instructional support personnel, paraprofessionals, and career guidance and academic counselors, including individuals in groups underrepresented in such professions.   + (E) A description of progress toward implementation of equal access to high-quality career and technical education courses and programs of study for all students, including— (i) strategies to overcome barriers that result in lower rates of access to, or performance gaps in, the courses and programs for special populations; (ii) providing programs that are designed to enable special populations to meet the local levels of performance; and (iii) providing activities to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations in competitive, integrated settings that will lead to self-sufficiency.   (Section 134(c) of Perkins V) |

* 3. Meeting the Needs of Special Populations
  + a. Describe the eligible agency’s program strategies for special populations, including a description of how individuals who are members of special populations—
    - i. Will be provided with equal access to activities assisted under this Act;
    - ii. Will not be discriminated against on the basis of status as a member of a special population;
    - iii. Will be provided with programs designed to enable individuals who are members of special populations to meet or exceed State determined levels of performance described in section 113, and prepare special populations for further learning and for high-skill, high-wage, or in-demand industry sectors or occupations;
    - iv. Will be provided with appropriate accommodations; and
    - v. Will be provided instruction and work-based learning opportunities in integrated settings that support competitive, integrated employment. (Section 122(d)(9) of Perkins V)
* 4. Preparing Teachers and Faculty
  + a. Describe how the eligible agency will support the recruitment and preparation of teachers, including special education teachers, faculty, school principals, administrators, specialized instructional support personnel, and paraprofessionals to provide career and technical education instruction, leadership, and support, including professional development that provides the knowledge and skills needed to work with and improve instruction for special populations. (Section 122(d)(6) of Perkins V)

1Based on the context of this requirement, the reference to the local application process under “section 132” appears to be a typographical error in the Perkins V statute. The correct section for local applications in Perkins V is section 134. Therefore, eligible agencies should respond to this item using the provisions in section 134 of Perkins V.

CTE Board of Trustees

The Rhode Island CTE Board of Trustees (CTE Board) is a statutorily-created board that establishes policies and provides oversight to Rhode Island’s CTE programs and the use of state and federal resources related to CTE.

The CTE Board was created by Rhode Island General Law 16-53 in 2014 to oversee an integrated and efficient CTE system in Rhode Island that is aligned to the real needs of Rhode Island’s industries and economy. Members of the Board are appointed by the governor, and seats are reserved for state leaders from industry, government, and labor. The CTE Board holds public meetings on a regular basis to ensure that all stakeholders in the CTE landscape are fulfilling the state’s commitment to prepare all students for success in college and career.

The CTE Board oversees a number of statewide Industry Advisories, organized around specific industry sector. The specific industry sectors correspond to the US Department of Education’s Career Clusters. Each of these advisories is composed of representatives from K-12 schools, industry, and postsecondary; the advisories are chaired by a representative from industry and education. Starting in 2016, these advisories began developing new, more rigorous, career-specific CTE program standards. CTE Board program standards are developed in the Industry Advisories, approved by the CTE Board, and adopted by RIDE. The CTE Board has approved over 50 program standards in all 16 clusters, including Priority Sectors. (See page 40 for a full discussion of Priority Sectors.) Each CTE Board Standard requires that students earn:

•          Academic skills. All of the CTE Board Standards include requirements for both academic coursework and technical coursework. The CTE Board recognized that students cannot be career-ready if they do not have academic skills. Proficiency in reading, writing, math, and other subjects are foundational to both college and career success. All of these academic skills are also connected to relevant majors at Rhode Island’s postsecondary institutions.

•          Industry-recognized credentials and/or college credit. The decision about what counts as an “industry-recognized credential” is made by industry representatives and is formally adopted by the CTE Board. This ensures Rhode Island’s CTE programs are meeting the specific needs of actual Rhode Island employers. The credentials of value also align with Rhode Island’s WIOA plan and the state’s overall credentials system.

•          Coursework and curriculum. The CTE Board Standards outline approved curricula or course sequences that help students earn the industry-recognized credentials and college credit described above.

•          Work-based learning. The CTE Board Standards may include work-based learning requirements. These standards outline the specific needs of employers in that career field. These career field standards build upon the minimum criteria set by the Governor’s Workforce Board, but provide more rigorous requirements and detail relevant to the specific industry.

•          Employability skills. Recognizing that employability skills are essential to students’ success in the workplace, the CTE Board Standards will clarify the specific skills that students should be developing for the workplace.

Collectively, these CTE Board Standards are written by schools and employers, with a goal of schools meeting the needs of employers. All CTE programs must demonstrate their alignment to these standards and report out annually on their students’ achievement of the culminating credentials. All CTE Board Standards are posted on the RIDE CTE website.

According to statute, the CTE Board has 15 members, allocated in the following manner:

•          Nine individuals who are representative of the private employment sector:

o          Five representatives of business, industry, and agriculture:

          Two members who are representatives of general business concerns

          One member who is a representative of small business concerns

          One member who is a private sector member of the governor's workforce board, or the Rhode Island workforce investment board, or state job training coordinating council (established pursuant to section 122 of the Job Training Partnership Act, 29 U.S.C. § 1532)

          One member who is a representative of the CTE Trust

o          Two members who are representatives of labor organizations, one of whom must be a career and technical teacher

o          Two members from trade associations representing employers in the state

•          Five individuals who are representative of secondary and postsecondary educational institutions, including:

o          One member who is a representative of the Rhode Island School Superintendents Association

o          One member who is a representative or the director of career and technical education programs and/or facilities

o          The commissioner of elementary and secondary education, or his/her designee

o          The commissioner of higher education, or his/her designee

o          One member who is a representative of adult education and skills training

•          The secretary of commerce or his/her designee shall be the fifteenth (15th) member ex officio

State-Approved CTE Programs

CTE in Rhode Island is designed for individuals who are interested in entering the workforce or are preparing for careers and want to take advantage of postsecondary education and training opportunities. With more than ten regional centers, 54 comprehensive high schools, charter schools, postsecondary institutions and adult programs in the network, Rhode Island learners have unprecedented access to a broad array of educational programs.

CTE programs are required to:

•          Align to a set of industry-specific career program standards established by the CTE Board

•          Include a series of at least three non-duplicative courses, including academic coursework

•          Include work-based learning experience for every student aligned to Governor’s Workforce Board Guidance and, as applicable, any CTE Board work-based learning standards

•          Allow students to earn “culminating credential” of an industry-recognized credential and/or postsecondary credit, as established by the CTE Board

•          Help students develop employability skills

Since 2014, the number of CTE programs in the state of Rhode Island has increased from 70 to 226 (280% growth).

Under Rhode Island’s CTE Regulations, passed in 2012, students may attend any CTE program in the state, regardless of their home district. This open enrollment policy ensures that 100% of high school students have access to CTE programming in a Priority Sector.

P-TECH

Pathways in Technology Early College High School (P-TECH) offers high school students the opportunity to earn an associate degree while in high school. The P-TECH initiative, based upon IBM’s successful grade 9-14 model, helps Rhode Island’s high school students prepare and train today for the jobs of tomorrow.

Through collaboration between the state, school districts, the Community College of Rhode Island, and Rhode Island employers, the initial P-TECH programs opened at three high schools (Rogers High School in Newport, Providence Career and Technical Academy, and Westerly High School) in 2016. Two more P-TECH programs launched in fall 2017 at North Providence High School and Woonsocket Area Career and Technical Center. A vital aspect of the P-TECH model involves aligning high school and college coursework to employer needs, creating internships that prepare students to succeed in college and career, and industry mentorship. In 2019, Rhode Island Commerce announced the development of a Center for Advanced Manufacturing at William M. Davies, Jr. Career and Technical High School in Lincoln that is incorporating the key elements of the P-TECH model.

PrepareRI

Rhode Island has created an integrated and aligned statewide system to prepare all students for success in college and career. This umbrella initiative is called Prepare Rhode Island (PrepareRI). PrepareRI launched in 2017, based on a multi-year, interagency PrepareRI Action Plan written jointly by the Governor’s Office, the Rhode Island Department of Education, the Governor’s Workforce Board, the Office of the Postsecondary Commissioner, and Rhode Island Commerce.

Prepare Rhode Island is one of the most ambitious plans in the nation to improve career readiness. It represents a strategic partnership between the Rhode Island government, private industry leaders, the public education system, universities, and non-profits across the state.

The initiative was built on the belief that all young people – regardless of their background or intended career – will need some form of postsecondary credential and work experience. The goals for the PrepareRI initiative parallel the goals of the Rhode Island CTE Board of Trustees (CTE Board).

Governor’s Workforce Board (GWB)

The Rhode Island Governor’s Workforce Board (GWB) is the governing body charged with the continuous improvement of the workforce system and oversight of Workforce Innovation and Opportunity Act (WIOA) funds and programs. GWB’s Board consists of industry leaders from across the state who are appointed by the Governor to oversee workforce development activities statewide. Local Workforce Investment Boards (WIBs) fall under the auspices of GWB, which is part of the PrepareRI umbrella. GWB also has a seat on the CTE Board to further ensure alignment between the CTE Board and the workforce investment boards.

State Initiatives to Increase Career Readiness

Internship Program

Part of PrepareRI’s approach has been to work with a Statewide Career Readiness Intermediary to form a bridge between businesses and schools. The organization that won the contract for this intermediary role, Skills for Rhode Island’s Future, designed and implemented a summer internship program. Starting in summer 2018, the PrepareRI Internship Program began placing Rhode Island high school juniors in paid summer internships with the state’s top employers in a range of industries. Through a partnership with a local college, students also earn college credit for completing the internship.

The internship program benefits both students and industry. For students, the internships prepare youth with the skills they need to pursue meaningful, fulfilling futures through professional skills training, on-the-job experience, and connections to adult mentors who can help them achieve their career goals. For employers, the internships help diversify their workforce and build a strong pipeline of young, skilled workers who can keep Rhode Island’s future economy vibrant and strong.

The PrepareRI Internship Program has seen tremendous growth, interest and success from both students and employers. In the second year of the program (2019), over 10% of all 11th grade students in the state applied. This level of interest is partially the result of an intensive recruitment and awareness campaign from Skills for Rhode Island Future, which placed an emphasis on recruiting students of color and students attending schools with high poverty rates. In 2019, over 326 students were accepted to the program and completed all requirements. Rhode Island plans on continuing to expand the PrepareRI Internship Program in coming years.

Computer Science for Rhode Island

Computer Science for Rhode Island (CS4RI) is among the most comprehensive statewide computer science initiatives in the country.  CS4RI uses a coalition approach by combining national initiatives with local expertise to increase and broaden participation in quality computer science education and professional development. This ensures that computer science learning opportunities and access are available to all Rhode Island students in the years ahead.

In 2015, prior to the launch of CS4RI, only 1% of Rhode Island high school students enrolled in Computer Science (CS) courses and 42 students took the Advanced Placement Computer Science exam. No students of color passed. Today Rhode Island is proud to be among the national leaders in CS education with CS offered in 100% of its school districts and every school in the state participating in CS4RI. Many of these CS programs are state-approved programs, and RIDE aims to increase that number.

Through this effort, Rhode Island has seen record adoption of new CS programs in schools around the state, tripled the number of AP programs, and achieved more than a 500% increase in the number of students taking an AP CS exam since 2015. CS4RI has trained more than 940 educators through free, high-quality CS professional development programs, and empowered students to earn more than 2,500 computer science college credits while still in high school at no cost to the students. 18 out of 32 districts have students taking Computer Science related Concurrent or Dual Enrollment Courses through the University of Rhode Island; of those eighteen districts, eight (44%) are urban districts.

On an annual basis, the CS4RI Summit brings together over 2,000 high school and college students, industry professionals, training providers, and community members to showcase projects, research, education, and career opportunities related to computer science and technology. The goal is to excite students from across Rhode Island with the varied educational and career opportunities that result from studying computer science.

PrepareRI Dual Enrollment Fund

Rhode Island is committed to supporting students in taking college courses to earn credit while still in high school. In 2013, the Rhode Island General Assembly passed legislation (RIGL 16-100) that called for the adoption of a statewide policy for dual enrollment that allows students to take college courses to earn credit at both the secondary school and the higher education institution. Subsequently, the Board of Education adopted regulations in April of 2015 that provide all qualified Rhode Island high school students access to college level coursework while still in high school.

The PrepareRI Dual Enrollment Fund allows any public high school student to access dual enrollment courses with University of Rhode Island (URI), Rhode Island College (RIC), and Community College of Rhode Island (CCRI) at no cost to the student or their family. Each public college has both concurrent and dual enrollment opportunities available to students covered by the PrepareRI Dual Enrollment Fund, but each school has different names for their respective programs.

Students can access college-level courses in two ways by taking:

•          Concurrent enrollment courses at their high school: these courses are the same courses that are taught at the college but are approved to be taught at the high school, by the high school teacher.

•          Dual enrollment courses at the institution’s campus: these courses are part of the institution’s regular schedule and are taught by a college professor.

Apprenticeships

Rhode Island has two comprehensive apprenticeship programs, the PrepareRI Youth Apprenticeship program (PRIYA) and Propel America (Propel).

PRIYA is an opportunity for high school seniors to earn while they learn, embarking on a specific career pathway while still in high school. Career pathways available for the 2019-2020 school year include: Pharmacy Technician, Medical Assistant, Process Technologist, and Horticultural and Landscape Technician. PRIYA students are high school seniors that enroll full-time at the Community College of Rhode Island (CCRI), through its Running Start program. Students work part-time, take classes that directly relate to their employment experience, and work closely with their employer and CCRI to coordinate the beginning of a career path while still in high school. Each employer partner works closely with CCRI staff to coordinate touchpoints to CCRI coursework and guidance to and through associate degree programs that directly link to the student’s work and career development. Employers are committed to offering flexible scheduling that allows a student to continue working after high school, while a student is working towards a degree at CCRI through the Rhode Island Running Start or enrichment programs.

Propel America (Propel) is a national nonprofit that helps young adults go from high school into a strong career and higher education within one year of high school graduation. Propel connects high schools, job-training organizations, community colleges, and local employers to build a clear path forward for students. Propel is only available to second semester seniors that are due to graduate in the spring.

Individual Learning Plans (ILPs)

As part of RIDE’s strategy to prepare every student for college and career, every child in Rhode Island in grades 6-12 is now required to have an Individual Learning Plan (ILP).  The ILP is a student-directed planning and monitoring tool that customizes learning opportunities throughout students' secondary school experiences, broadens their perspectives, and supports the attainment of goals. The ILP documents students’ interests, needs, supports, course selections (including access to college-level programming), transition placements, and other learning experiences both in and out of school. This information produces a thoughtful program of study leading to proficiency for graduation and postsecondary experiences.

The ILP is more than a repository of information about a student; it is a dynamic tool that maps academic plans, and reflects each student’s unique set of interests, needs, learning goals and graduation requirements. The ILP process engages all students in a way that advances goal setting, decision-making, and self-advocacy skills that support their lifelong learning.

To support the implementation of ILPs RIDE has:

•          Created an ILP framework, adoption toolkit, and school adoption success plan

•          Created a menu of state approved ILP platform vendors and provides increased support and training for counselors

•          Expanded career exploration programming in middle schools through grants, partnerships with quality curriculum providers, and career fairs

•          Hosted the Junior Achievement career fair, which supported nearly 50% of Rhode Island's 8th graders

Career Exploration Grants

PrepareRI has developed the Career Exploration Grant program to support schools in implementing strong career awareness programs beginning in middle school. The grants are intended to accelerate the integration of career exploration activities with existing learning experiences in middle school to help expose students to careers in Priority Sectors. Career Exploration Grants require a partnership between middle schools and industry. In 2019, 18 schools received this grant and are benefiting from ongoing support provided by RIDE and the CTE Board.

For a more detailed discussion of Career Exploration Grants see Section II.C.2.a on page 66.

School Report Cards: Postsecondary Success Index

RIDE values transparency and believes that education data should be as accessible and easy-to-understand as possible.

In 2018, as part of the state’s updated system of school accountability under the Every Student Succeeds Act (ESSA), the federal education law, Rhode Island created a new and user-friendly Report Card platform that makes it easier than ever for students, educators, and families to understand how their school community is performing. The Report Card platform displays a range of education data, including student performance, school-level spending, and the results of the state’s annual school climate and culture survey (called SurveyWorks).

In 2019, RIDE released new two measures for high schools, collectively called “Diploma Plus.” The name refers to the fact that, in today’s economy, students need to graduate with a diploma plus additional credentials and specialization. One of the Diploma Plus metrics, called the Postsecondary Success Index, measures how many students graduate with industry-recognized credentials (as defined by the CTE Board) and/or college credit. This index provides schools with a clear incentive to improve their students’ career readiness through CTE.

PrepareRI Ambassadors

The PrepareRI Ambassadors are a select group of education leaders who use their expertise, knowledge, and connections to advance PrepareRI’s goal of building career pathways for all Rhode Island youth. The Ambassadors have diverse backgrounds, and may be currently working as a superintendent, district administrator, principal, school administrator, teacher, college professor or administrator, community leader, or any other position related to youth career pathways. They have supported RIDE and the CTE Board in understanding the needs of our schools as they advise on the development of policies including work-based learning, subcommittee standards, and teacher certification.  Ambassadors continue to work full-time in their previous roles, but commit five hours per week to their Ambassadorship and receive a small stipend.

Ambassadors advance PrepareRI’s goals in three key ways. First, the Ambassadors create a toolkit that helps stakeholders in the state implement some component of the PrepareRI Action Plan. Second, the Ambassadors serve as policy advisors, leveraging their expertise to provide feedback and insights to PrepareRI’s core team and their fellow ambassadors. Third, Ambassadors are spokespeople for PrepareRI, spreading the goals of PrepareRI through their professional networks, and validating the importance of PrepareRI through their endorsement and participation.

***II.B.1.b. Describe the State's strategic vision and set of goals for preparing an educated and skilled workforce (including special populations) and for meeting the skilled workforce needs of employers, including in existing and emerging in-demand industry sectors and occupations as identified by the State, and how the State's career and technical education programs will help to meet these goals.  (Section 122(d)(2) of Perkins V)***

Governor’s Vision

In her 2019 Inaugural Address, Governor Raimondo declared: “We won’t stop until every Rhode Islander has a shot at a good paying job. Our world is changing so quickly. This change requires all of us to be lifelong learners. No matter who you are, where you come from or what point you're at in your career, you deserve access to job training, an apprenticeship, and education that will help you get ahead in whatever field you choose.” The Governor’s challenge envisions a Rhode Island where individuals from all income and skill levels, no matter their present circumstance, can rise up the career ladder and improve the economic circumstances for themselves and their families. In the process, Rhode Island employers receive a distinct competitive advantage in the form of a vibrant and talented labor market from which they can draw.

PrepareRI is the structure Governor Raimondo has used to advance this vision. Stated succinctly, the mission of PrepareRI is to:

Prepare all Rhode Island students for success in college and career

PrepareRI is built around a four-stage process of workforce preparation for all students:

1.Career exploration: Starting no later than 6th grade, students explore a variety of different industries and job sectors to discover their passions. Students then work with a school counselor (or other faculty member) to create an Individual Learning Plan (ILP), which becomes a roadmap to their future career.

2.Expertise: Starting in high school, students build expertise and content knowledge in their specific career field of interest. Students learn through CTE programs and college-level coursework aligned to real-world requirements of their future career.

3.Experience: While skills and knowledge gained in the classroom is important, true mastery involves students applying their skills in the real world of work. All high school students should participate in a rigorous work-based learning experience, such as internships, apprenticeships, industry projects, service learning, or school-based enterprises.

4.Career: Following high school or postsecondary (depending on the career field), students enter the workforce in a high-wage, high-demand industry aligned to their passions.

Goals

The CTE Board has partnered with RIDE to develop long-term goals for CTE. The CTE Board is the driver of creating standards and providing program oversight to ensure students will be prepared to meet the current and future needs of industry, and grow the state’s economy.

In order to fulfill this mission, the following goals have been developed based on the labor and economic conditions of our state, future needs of industries, and the strengths of the workforce network. All programs within the state workforce network have committed to these goals, each playing their own respective role within the larger mission. Attaining these goals will not be possible without making significant strides in services to all students, including youth and individuals with barriers to employment. Collectively, these goals create a focus on guiding all Rhode Islanders towards success in the state’s economy.

The long-term goal for Rhode Island’s CTE programs is for Rhode Island youth to have a job, be enrolled in an educational program, or enlist in the military within six months of graduation.

CTE Programs’ Role in Preparing a Skilled Workforce

To achieve the state’s long-term goals, CTE programs will:

1.         Align to Rhode Island’s Priority Sectors and emerging industries, wherever possible, to prepare students for the future Rhode Island economy

2.         Provide students with the core academic skills needed for college and career success

3.         Allow students to earn college credits and/or an industry-recognized credentials of value

4.         Provide students with access to high-quality, rigorous work-based learning experiences that include the development of identified employability skills that meet the CTE Board Standards

5.         Connect to career exploration programming in middle schools and students’ Individual Learning Plans (ILPs) with a focus on awareness of Priority Sectors and emerging industries

6.         Use data-driven decision-making, with the oversight and collaboration of the CTE Board and RIDE

7.         Align and leverage funding sources to ensure the quality and growth of CTE programming

8.         Build a pipeline of qualified CTE teachers, and continuously improve the practice of the existing teacher workforce through professional learning

RIDE’s Office of College and Career Readiness (OCCR) achieves these goals by defining core values and using them to guide how the office operates and makes decisions.  OCCR is guided by these four core values:

• Equity: We value diversity, and provide whatever supports are needed to help all people achieve excellence.

• Learning: We are always hungry to do better, and constantly seek out new opportunities for growth.

• Results: We are unwavering in our goals, but flexible in our approach.

• Partnership: We break down barriers so we can go further together.

Equity is a foundational value of RIDE and the CTE Board. Our CTE system is based on the belief that all students will be prepared for college and career success. Students from special populations will succeed when provided with the necessary resources and supports. It is the state’s responsibility to provide those resources and supports to help all of Rhode Island’s students thrive in the state’s economy.

***II.B.1.c. Describe the State’s strategy for any joint planning, alignment, coordination, and leveraging of funds between the State's career and technical education programs and programs of study with the State's workforce development system, to achieve the strategic vision and goals described in section 122(d)(2) of Perkins V, including the core programs defined in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102) and the elements related to system alignment under section 102(b)(2)(B) of such Act (29 U.S.C. 3112(b)(2)(B)); and for programs carried out under this title with other Federal programs, which may include programs funded under the Elementary and Secondary Education Act of 1965 and the Higher Education Act of 1965.  (Section 122(d)(3) of Perkins V)***

CTE Board of Trustees

The Board of Trustees is an employer-majority board responsible for ensuring a comprehensive and coordinated career and technical education system within the state. The 15-member board includes representatives from the private sector, K-12 education, postsecondary education, workforce boards, and economic development agencies.

For more information on the CTE Board, see Section II.B.1.a on page 13. For more information on how the CTE Board sets standards for CTE programs, see section II.B.2.a on page 31.

CTE Statewide Industry Advisories

The CTE Board oversees a number of statewide Industry Advisories, organized around specific industry sectors, which correspond to US ED Career Clusters. Each of these advisories is composed of representatives from schools and industry, and are chaired by a representative from industry and education. For more information on the statewide Industry Advisories, see Section II.B.1.a on page 13.

Alignment to Priority Industry Sectors

Determining Priority Sectors involves expertise in economic modelling, analyzing labor market information, and surveying trends in the local economic landscape. RIDE and the CTE Board rely on the Rhode Island’s Long-Term Economic Development Plan, required by state statute and overseen by Rhode Island Commerce, to make these determinations. RIDE and CTE Board, with the advice of the Governor’s Workforce Board, maps the plan’s Priority Sectors to specific fields in the CTE Board Standards.

RIDE and the CTE Board (including the related state agencies of the Governor’s Office, Commerce, Office of Postsecondary Commissioner, and Governor’s Workforce Board) work to ensure CTE programs in the state provide students with a breadth of offerings, but emphasize growth in Priority Sectors. Priority Sectors are industry sectors that are high-skill and high-demand. Rhode Island’s CTE system will prepare students for jobs that will provide a rewarding career that will grow over the course of their lifetimes.

For more information on the Priority Sector determination, please see section II.B.2.c.iii on page 40.

CTE Program Approval

Programs must demonstrate industry role in curriculum identification, and overall program endorsement, as part of the approval process.  Through the program approval process, schools must provide letters of support from employers and assure ongoing industry involvement through advisory and work-based learning.

Programs must maintain industry relationships and ensure students complete work-based learning as part of each program.  The growth of the CTE Industry Advisories has increased the presence of industry in all state programs and supporting schools by aligning programs to employer-identified skills. As identified in the state’s WIOA industry and workforce analysis, employers have highlighted a need for all students to be prepared with employability skills and STEM-related skillsets. Program needs are validated through labor market information and student demand. RIDE, Governor’s Workforce Board (GWB), and the CTE Board have identified and prioritized work-based learning as a primary strategy for ensuring all students are able to gain these critical employability skills.

Funding for CTE programs

In addition to federal Perkins dollars, RIDE further supports CTE programs with Rhode Island state CTE Categorical Funding. To encourage growth in Priority Sectors, starting in FY19, CTE Categorical Funds are only generated by, and used for, programs in Priority Sectors. Programs receiving CTE Categorical Funds will report on the use of their funds to RIDE and the CTE Board on a quarterly basis.

Statewide Action Plan

In 2016, Rhode Island developed an interagency PrepareRI Action Plan for education and workforce by 2020. The plan led to dramatic improvements in Rhode Island career preparation landscape.

Rhode Island is currently in the process of developing a new five-year plan, for 2020-2025. This plan is being developed to integrate and align directly with this Perkins V plan and the state’s WIOA plan, all of which are being drafted together.

PrepareRI

Over the past five years, Rhode Island has worked to align priorities, resources, and processes across the state agencies responsible for economic and workforce development. To build on this work, Rhode Island has decided to submit the Rhode Island State Plan in the overall WIOA state plan. This will help to ensure continued coordination between the responsible agencies.

RIDE plans to continue a core inter-agency working group, known as the PrepareRI Core Team, which had been developed to facilitate inter-agency cooperation to build career pathways for all Rhode Island youth. This group is comprised of representatives from the following agencies:

•          Governor’s Office (GO)

•          Department of Labor and Training (DLT)

•          Governor’s Workforce Board (GWB)

•          RIDE

•          Rhode Island Commerce

•          Office of Postsecondary Commissioner (OPC)

•          Community College of Rhode Island (CCRI)

•          Other agencies and/or organizations that lead core programs or policies related to workforce readiness of RI students and adults

Starting in 2017, the PrepareRI Core Team began meeting weekly to leverage the collective power of the major players in Rhode Island’s workforce development landscape around a common action plan. The Core Team establishes new strategic priorities, adopted from the long-term Action Plan, every six months and sets monthly benchmarks for expected progress. The Core Team tracks progress on those priorities during every meeting.

In addition to policy and program alignment, this group works to align resources including the coordination of related state and federal funds. This has led to a dramatic increase in programs supporting students’ career readiness, as outlined in Section II.B.2.a on page 31.

Once a month, the PrepareRI Core Team provides updates to the leaders of the each of the agencies listed above. Members of this group include: the Commissioner of Elementary and Secondary Education, the Postsecondary Commissioner, the Director of the Department of Labor and Training, the Executive Director of the Governor’s Workforce Board, and senior representatives of the Governor. Status updates are given through a conference call coupled with a PowerPoint presentation. Important policy decisions and ways to continue to eliminate barriers for important stakeholders are also discussed during these meetings.

Given the success of the PrepareRI initiative, the Commissioner for RIDE has pushed for the idea of inter-agency teams as a best practice for similar initiatives. In December 2019, the state launched an Adult Education Interagency Core Team. This team is based on the PrepareRI model and brings together a similar group of agencies to better unite the state’s efforts to prepare adults for jobs.

Workforce Development Legislation

The strength of the PrepareRI Core Team is that it brings together important stakeholders on a weekly basis, including most of the agencies that oversee workforce development legislation in Rhode Island. This legislation includes:

•          RIDE

o          Strengthening Career & Technical Education for the 21st Century Act (Perkins V)

o          Adult Education and Family Literacy (WIOA Title II)

•          Department of Labor and Training (DLT)

o          Adult (Title I)

o          Dislocated Worker (Title I)

o          Youth (Title I)

o          Wagner-Peyser (Wagner-Peyser Act, as amended by Title III)

o          Trade Adjustment Assistance for Workers Program (Chapter 2, Title II Trade Act); Jobs for Veterans State Grants (Title 38, Chapter 41)

o          Migrant and Seasonal Farmworker Program (Title I)

o          Senior Community Service Employment Program (Title V Older Americans Act)

•          Department of Human Services (DHS)

o          Temporary Assistance for Needy Families (TANF) Program (42 U.S.C.)

o          Vocational Rehabilitation (Title I Rehabilitation, as amended by Title IV)

Governor’s Workforce Board (GWB)

The Rhode Island Governor’s Workforce Board (GWB) is the governing body charged with the continuous improvement of the workforce system and oversight of Workforce Innovation and Opportunity Act (WIOA) funds and programs. GWB ensures that the state workforce activities are aligned with the efforts of economic development, education, workforce development, government, and business stakeholders at the local and state level. This multifaceted alignment of public and private stakeholders creates a workforce system that is demand-driven, flexible, and responsive to the needs of Rhode Islanders.

Governor’s Workforce Board (GWB) Advisory Committees

RIDE relies on two specific advisory committees to provide input and guidance regarding CTE programs: the Education and Employment Advisory Committee (EEAC) and the Career Pathways Advisory Committee (CPAC).

EEAC is responsible for overseeing programs that ensure adults and out-of-school youth in/or approaching participation in the labor force have access and opportunity to obtain industry and/or postsecondary credentials, and jobs that provide living wages.

CPAC is responsible for overseeing the development and growth of career pathways that connect populations throughout the state with career opportunities. Central to this function is overseeing execution of the state’s PrepareRI Action Plan to provide all youth K-24 with access to flexible and quality career pathways programming through high quality delivery models inclusive of, and beyond, traditional CTE. This includes monitoring the implementation of a mixed-delivery career pathways system and holding various parties accountable for outcomes.

RIDE makes it a priority to attend both committee meetings to provide input and support.

WIOA Planning

Weekly meetings of the PrepareRI Core Team facilitated the coordination of alignment between the development of the Perkins Plan and the Workforce Innovation and Opportunity Act (WIOA) Plan. The Core Team recognized an opportunity to align all policies affecting workforce development. This proactive approach will allow key agencies to serve more youth and adult learners in the state of Rhode Island. Youth with Alternative Learning Plans, as well as Opportunity Youth were taken into deep consideration when formulating both plans. (Opportunity Youth are defined as young people between the ages of 16 and 24 who are neither enrolled in school nor participating in the labor market.) Members of the PrepareRI Core Team were intentional about attending Stakeholder Engagement Sessions for both plans.

***II.B.1.d. Describe how the eligible agency will use State leadership funds made available under section 112(a)(2) of the Act for purposes under section 124 of the Act.  (Section 122(d)(7) of Perkins V)***

Each year, Rhode Island will reserve up to 10% of the federal Perkins allocation for the following uses:

•          Provide technical assistance to grant recipients including: the use of data for continuous improvement as measured by federal and state metrics; building, maintaining, and strengthening recipient partnerships with industry and community partners; and increasing alignment of policy and programs in support of secondary to postsecondary education transition.  The exact amount dedicated to this each year may vary.

•          Conduct evaluations of effectiveness of CTE-related technical assistance, policy, and/or programs implemented at the state or local level.

•          Increase school buy-in and support of Career and Technical Student Organizations (CTSOs) by dedicating a portion of leadership funds earmarked for these organizations to be distributed to schools through the secondary formula.

•          Develop, implement and maintain centralized resources to support student, family and community access to information regarding CTE opportunities, with a focus on ensuring this information is accessible to special populations.

•          Provide funding and support to incarcerated youth and adults to receive industry-aligned career and technical education. Rhode Island will reserve at least 2% of its state allocation per Perkins law.

**II.B.2. Implementing Career and Technical Education Programs and Programs of Study**

***II.B.2.a. Describe the career and technical education programs or programs of study that will be supported, developed, or improved at the State level, including descriptions of the programs of study to be developed at the State level and made available for adoption by eligible recipients.  (Section 122(d)(4)(A) of Perkins V).***

Industry-led development of CTE standards

Rhode Island, through the CTE Board of Trustees (CTE Board), has developed state standards for secondary programs within all 16 career clusters identified by the US Department of Education. These CTE Board Standards identify requirements for coursework, expected postsecondary outcomes (including a “culminating credential” of either industry credentials and/or postsecondary credits), work-based learning, and employability skills. The CTE Board Standards that have been approved by the CTE Board and adopted by RIDE can be found on the RIDE CTE website.

CTE Board Standards are developed by statewide CTE Board Advisories, subcommittees of the CTE Board that are organized around major industry sectors or career clusters. These Advisories are led by two co-chairs: one from industry and one from education. The CTE Board of Trustees voted in 2019 to add representatives from public institutions of higher education as non-voting members of the Board, and to add postsecondary co-chairs to the sector-specific subcommittees.  This creates an additional line of continuous communication and collaboration between secondary and postsecondary eligible recipients. The intention of the CTE Board Advisories is to ensure that students graduate high school both college and career ready.  The Advisory for each industry sector drafts the CTE Board Standards for career fields within that industry. Once finalized, these standards are presented to the full CTE Board for a vote. If approved by the CTE Board, the standards are sent to RIDE for implementation.

All CTE Board of Trustees Standards include the following components:

•          CTE curriculum and coursework requirements, including at least a three-course, non-duplicative sequence

•          Academic course requirements

•          A “culminating credential” of an industry-recognized credential and/or postsecondary credit

•          Work-based learning requirements aligned to the Governor’s Workforce Board (GWB) guidance, and any relevant CTE Board work-based learning standards

•          Industry-specific labor market information, job outlook information, and occupations related to this career cluster

•          Identification and development of relevant employability skills

•          Any required teacher certifications, as identified by RIDE

Connecting secondary and postsecondary

Each of the secondary CTE programs is mapped to an aligned “Guided Pathway” at the Community College of Rhode Island (CCRI) and University of Rhode Island (URI). Guided Pathways are groups of majors at URI and CCRI, similar to career clusters.

RIDE has mapped the CTE Board Standards for secondary programs to postsecondary Guided Pathways, so all students can easily follow a CTE program of study that spans secondary and postsecondary.

***II.B.2.b.i Describe the process and criteria to be used for approving locally developed programs of study or career pathways, including how such programs address State workforce development and education needs and the criteria to assess the extent to which the local application under section 132 will promote continuous improvement in academic achievement and technical skill attainment;***

Program Approval and Renewal

Secondary Programs

For secondary programs, RIDE and the CTE Board has established a program approval process in which programs may be approved for terms of up to five years. Components of the application include:

•          Evidence of meeting the RIDE CTE Regulations from 2012

•          Indicating which of the aforementioned CTE Board Standards the program will meet.

•          Demonstrating industry involvement in the development of the program and courses.

•          Identifying school-level personnel who will attend regular statewide CTE Board Advisory meetings pertaining to the program’s sector.

•          Identifying the teachers for the courses in the sequence, and providing evidence of proper certification.

•          Identifying intentional, coordinated alignment of academic, technical, and employability skills.

•          Indicating how the program will collect and analyze disaggregated data to support continuous improvement and confirm their state reporting abilities for the state CTE Program accountability system.

•          Identifying work-based learning experiences that all students will complete, and which meet GWB guidance and any CTE Board work-based learning standards.

RIDE reviews applications for new CTE programs, and presents its recommendations to the CTE Board for discussion and vote, which may include input from the CTE Advisories. RIDE issues official letters of approval to programs.

RIDE-approved CTE programs will be given an approval designation for up to five years and RIDE reserves the right to withdraw RIDE-approved designation if there are major changes in the structure of the program from what was originally approved, or if student outcomes are consistently not meeting expectations.

Postsecondary Programs

For postsecondary programs, programs will apply through an annual Perkins funding application in which they must demonstrate industry demand, alignment and credit contributions towards available degree programs, data collection mechanisms and processes for analyzing collected data for the purposes of continuous improvement. RIDE-approved CTE programs will be given an approval designation for up to five years, and RIDE reserves the right to withdraw RIDE-approved designation if there are major changes in the structure of the program from what was originally approved, or if student outcomes are consistently not meeting expectations.

CTE Accountability

Beginning in 2019, RIDE began releasing CTE Accountability data based on the statewide CTE Board of Trustees requirements. The goal of this accountability data is to provide more transparency and accountability for programs, allowing districts, schools, and families to make data-driven decisions about the quality of CTE programs in their community. The CTE Accountability metrics were approved by the CTE Board in winter 2018. A key metric in the CTE Accountability system is the program completion rate, a measure of how many graduating students met all state standards in their CTE program.

Professional Learning through CTE Board Industry Subcommittees

CTE Board Advisories meet, at a minimum, twice each academic year. During these meetings, the Advisories may: review overall program operations, identify or validate instructor professional development opportunities, propose any modifications to the CTE Board Standards in their industry cluster or develop a new career-specific standard for growth occupations or emerging industries.

***II.B.2.b.ii Describe the process and criteria to be used for approving locally developed programs of study or career pathways, including how such programs address State workforce development and education needs and the criteria to assess the extent to which the local application under section 132 will expand access to career and technical education for special populations.***

Statewide Open Enrollment for CTE

Per the CTE Regulations passed in 2012 by Rhode Island’s Council on Elementary and Secondary Education, all students shall have the right to request, from their resident Local Education Agency (LEA), access to a RIDE-approved career preparation program of their choice.  This right of access shall be limited only by the following three conditions:

1.         Availability of enrollment seats;

2.         Geographic location; and,

3.         Fair, equitable and reasonable admission standards.

Any student denied access to a career preparation program reserves the right of appeal through the policies and procedures managed by the LEA responsible for the denial of access.

Reporting on Admissions to CTE Programs

Local Education Agencies (LEAs) operating RIDE-approved CTE programs have the right to develop and employ appropriate program-specific admission criteria.  All admission criteria should comply with all relevant state and federal civil rights laws and regulations.  Admissions criteria should:

•          Be clearly derived from the academic and instructional demands of the approved CTE program;

•          Represent the minimum levels of student readiness so as to reasonably ensure student success in the CTE program;

•          Adhere to all relevant RIDE-developed admissions standards; and,

•          Not result in discriminatory admissions decisions.

LEAs that employ program-specific admission criteria should develop and implement an admissions policy that is formally adopted and made publicly available.  The policy should include no less than (1) the admissions criteria used in the selection process; (2) the application process and continuing enrollment conditions; and (3) a review and appeal process for any student denied admissions to a RIDE approved CTE program.

To fill available seats, RIDE-approved CTE programs shall use a lottery process that fairly and equitably selects students from the entire pool of applicants meeting the minimum admissions standards.  When applicable, LEAs shall retain the right to prioritize program enrollment for resident students.

Students denied access to a program based on the admissions process or admissions criteria reserve the right of appeal and the right to apply for another RIDE-approved CTE program of their choice.

Technical Assistance for Analyzing Data

Rhode Island will collect and analyze state and local program data, disaggregated by student subgroup. Recipients are required to review this data regularly for use in program improvement. Rhode Island will focus technical assistance on this analysis and program improvements in support of closing participation or performance gaps.

Expanding Access

RIDE is expanding access in a number of ways, including:

•          Increasing marketing funds available to promote CTE opportunities;

•          Launching a new Unified Enrollment Platform: This platform will provide students with the ability to enroll in different courses and programs available through RIDE in one centralized location; and

•          Through Equity Grants: grants offered to CTE programs with the objective of closing participation or performance gaps. These grants require applicants to analyze program data, determine a root cause for any participation or performance gap by any student subgroup, and propose an actionable, sustainable solution for addressing the identified gap. Equity Grants are a way to ensure that programs are being designed with student access at the forefront.

***II.B.2.b.iii Describe the process and criteria to be used for approving locally developed programs of study or career pathways, including how such programs address State workforce development and education needs and the criteria to assess the extent to which the local application under section 132 will support the inclusion of employability skills in programs of study and career pathways. (Section 122(d)(4)(B) of Perkins V).***

Rhode Island will support the inclusion of employability skills in CTE programs by:

The CTE Board, through the CTE Advisories will create a definition of employability skills, and develop a process for measurement of employability skills that will be required for approved secondary CTE programs.

Changing funding and management of career and technical education student organizations (CTSOs) from flat state grants to school-driven investments aligned to programs offered in each school. Rhode Island’s program approval will ask schools to indicate if they are aligning CTSOs to programs, how they will integrate into program curriculum and ensure program participation. Rhode Island sees strategic, aligned CTSOs as an opportunity for students to build employability skills. (See the funding section II.C.2.a. on page 66 for more information.)

Ensuring that schools are utilizing comprehensive counseling programs, and in particular Individual Learning Plans (ILP), to promote academic, career, and social emotional development. ILPs are required for all students beginning in sixth grade by the Council on Elementary and Secondary Education’s Regulations Governing Secondary Education Environments. ILPs assist in guiding students in possible career paths, while empowering students to take the lead in their own growth.

Including work-based learning as a statewide strategy for students to acquire employability skills. All students in CTE programs are required to meet the Governor’s Workforce Board guidance and any relevant CTE Board work-based learning standards.

Ensuring postsecondary programs identify ways that each program will integrate and assess employability skills.

***II.B.2.c.i Describe how the eligible agency will make information on approved programs of study and career pathways (including career exploration, work-based learning opportunities, early college high schools, and dual or concurrent enrollment program opportunities) and guidance and advisement resources, available to students (and parents, as appropriate), representatives of secondary and postsecondary education, and special populations, and to the extent practicable, provide that information and those resources in a language students, parents, and educators can understand;***

 Unified Enrollment and Information System

While RIDE has an open enrollment policy for CTE programs within the state in Section II.B.1.a on page 15, students and families will only be able to take advantage of this policy if information on programs is easy to access and understand. With that in mind, Rhode Island will develop a centralized enrollment and information system. This tool will help students and families navigate the various programs available to them throughout the state.

Rhode Island has begun efforts to develop this during FY20, with plans to ultimately encompass all CTE, dual and concurrent enrollment, Advanced Course Network, Charter Schools and other opportunities in coming years. This system will include admission processes and enrollment procedures. In January 2020, RIDE issued an RFP for a vendor to fill this role.

Rhode Island will publish CTE Program Report Cards annually. These reports will help students and families make choices about the right opportunity for their needs, and will help schools to determine gaps and needs for program improvement. See Section II.B.2.b.i, page 33 for more information about the CTE Program Report Cards.

Sharing Information with Schools

RIDE is employing multiple channels of communication with school and district personnel to ensure they have the information they need to run successful CTE programs. The structures for communication with schools include:

•          CTE Board Meetings and Industry Advisories

o          The CTE Board holds public meetings on a regular basis to discuss matters of importance for CTE in the state. Industry Advisories meet to provide industry-sector specific information and discussions.

•          Career Coordinators Network

o          RIDE organizes statewide monthly meetings with Career Coordinators to disseminate relevant information. The Career Coordinators are staff members at high schools who serve as liaisons between RIDE, school administrators, and students. Currently, nearly 90% of high schools in the state have identified a Career Coordinator.

•          PrepareRI Newsletter and Commissioner’s Field Memo

o          RIDE shares updates with people across the state, including all superintendents, principals, and teachers through the PrepareRI Newsletter (on a monthly basis) and the Commissioner’s Field Memo (on a weekly basis).

•          PrepareRI Ambassadors

o          This group of education and community leaders help to guide PrepareRI’s implementation. They use their unique perspective and skills to advise the PrepareRI team, create resources and trainings to help their colleagues, and serve as spokespeople for the initiative.

•          PrepareRI Summits

o          Educators and community influencers have an opportunity to gain professional development through PrepareRI Summits. Summits allow for the sharing of best practices, including the implementation toolkits developed by the PrepareRI Ambassadors.

•          Employer groups

o          Employer groups, trade associations, chambers of commerce, and other related stakeholders will share information relevant to their members.

Career Exploration

Before students fully commit to a CTE program in a particular career field, they should explore the many different possible careers available to them.

RIDE has developed the Career Exploration Grant program to support schools in implementing strong career awareness programs, beginning in middle school, which connect schools and industries, particularly those in Priority Sectors and emerging industries. RIDE began a pilot program of the Career Exploration Grant program in 2019, and provided grants to 18 middle schools. Starting in FY21, the Career Exploration Grants will be offered annually, using Rhode Island’s Perkins Reserve Fund.

RIDE is also developing a database of resources to support academic, career, and social emotional development and goal setting as it relates to comprehensive counseling programs and Individual Learning Plans. This tool is targeted for use by educators and administrators in middle and high schools.

***II.B.2.c.ii. Describe how the eligible agency will facilitate collaboration among eligible recipients in the development and coordination of career and technical education programs and programs of study and career pathways that include multiple entry and exit points;***

Participation in CTE Board Advisories

To facilitate collaboration among eligible recipients in the development and coordination of career and technical education programs and programs of study, Rhode Island requires all state-approved programs to designate school-level personnel to regularly participate in CTE Board Advisories. The advisories are tasked with developing program standards, continuous improvement of state program expectations, and continued alignment with industry expectations, including (but not limited to) work-based learning and employability skills. The CTE Board Advisories are also expected to promote best practices for teaching CTE in their career field.

***II.B.2.c.iii. Describe how the eligible agency will use State, regional, or local labor market data to determine alignment of eligible recipients' programs of study to the needs of the State, regional, or local economy, including in-demand industry sectors and occupations identified by the State board, and to align career and technical education with such needs, as appropriate;***

Using Data to Define Priority Sectors

Under Rhode Island General Legislation 42-64.17, the state of Rhode Island must develop a “long-term economic development vision and policy for the state of Rhode Island” every four years. This report, hereafter called the Long-Term Economic Development Plan, provides a detailed analysis of Rhode Island’s economy, based on labor market information, historical data, and likely future trends. Rhode Island Commerce manages this report. This report identifies the high-skill, high-demand industry sectors (hereafter called “Priority Sectors”) in the state of Rhode Island.

RIDE and the CTE Board, in partnership with Rhode Island Commerce, the Department of Labor, and the Governor’s Workforce Board, identify which CTE Board Standards and career fields fall under the Priority Sectors identified in the Long-Term Economic Development Plan.

The first such report was conducted by the Brooking Institution in 2016, and was entitled “Rhode Island Innovates.” This report led to the identification of the following Priority Sectors:

•          Bioscience

•          Business

•          Construction

•          Defense

•          Education & Training

•          Healthcare

•          Hospitality & Tourism

•          Information Technology

•          Manufacturing

•          Marine Trades

RIDE and the CTE Board have adopted this list for use in prioritizing resources. In order to be eligible for Perkins dollars, all LEAs must have at least one state-approved program in a Priority Sector.

Rhode Island Commerce released an updated Long-Term Economic Development Plan in February 2020 under the title “Rhode Island Innovates 2.0.” This new report will be used to update the list of Priority Sectors in the CTE Board Standards document.

Aligning State CTE Funding to Priority Sectors

RIDE will use state, regional, or local labor market data to determine the alignment of eligible recipients' programs of study to the needs of the state, regional, or local economy, including Priority Sectors, and to align career and technical education with such needs.

Established with the support and input of the CTE Funding Working Group in 2018 and the CTE Board, this approach to CTE funding applies the same process to all schools of choice: charters, state schools, and CTE programs. This formula factors in local per pupil costs, state share, and community wealth.

To be eligible for state CTE Categorical Funding, CTE programs must:

•          Prepare students for careers in Priority Sectors; and

•          Meet the program standards adopted by the CTE Board

Effective July 1, 2020, CTE Categorical Funding will be invested into the program that generated the funds. Funds may not be reallocated to different CTE programs within the same school.

Each recipient will be required to submit an annual expenditure report detailing how funding was invested.  LEAs may request a waiver from some or all of this requirement. Waiver requests must be made to RIDE, which will evaluate the request based on standards set by the CTE Board and notify the CTE Board of any waivers granted at the CTE Board’s next meeting. Schools are required to demonstrate business demand through the state program approval process and the local needs assessment.

Rhode Island General Law 16-53 outlines the duties and responsibilities of the CTE Board on the policy principles and goals that govern the distribution of financial assistance from state funds.

***II.B.2.c.iv. Describe how the eligible agency will ensure equal access to approved career and technical education programs of study and activities assisted under this Act for special populations;***

RIDE will ensure equal access to approved career and technical education programs of study and activities assisted under this Act for special populations through:

• The program approval process, which considers program recruitment, admission, enrollment and retention policies.

• The program accountability system, which reports disaggregated data whenever possible to identify participation and/or performance gaps by student population. RIDE will require programs that have consistent participation or performance gaps to conduct a root cause analysis and address the issue to continue to qualify for funding for the program.

• State-coordinated communication through a central information and enrollment platform to be developed in FY20 and FY21.

 See Section II.B.3 on page 51 for more information.

***II.B.2.c.v. Describe how the eligible agency will coordinate with the State board to support the local development of career pathways and articulate processes by which career pathways will be developed by local workforce development boards, as appropriate;***

 Rhode Island’s Board of Education is the chief policy-setting body overseeing K-20 education in Rhode Island. Through its designated powers and duties, the Board helps shape the course of public education to ensure that all of the state's students receive the best possible education. The Board is divided into a Council of K-12 Education and a Council of Postsecondary Education.

The 17-member Rhode Island Board of Education was created by the Rhode Island General Assembly in 2014 and replaced the Board of Regents for Elementary and Secondary Education and the Board of Governors for Higher Education. This consolidated governance of all public education in Rhode Island is an innovative integration of policymaking and planning for elementary, secondary, and higher public education in our state.

In 2012, The Rhode Island Board of Regents for Elementary and Secondary Education approved and adopted, effective July 1, 2012, the Board of Regents Regulations Governing Career and Technical Education (CTE) in Rhode Island, which supersedes all previous rules and regulations pertaining to career and technical education and vocational education. This body is commonly called the CTE Board of Trustees (CTE Board). These regulations can be found on RIDE’s CTE website.

RIDE is the eligible agency coordinate with the State Board and the CTE Board to support the local development of career pathways.

***II.B.2.c.vi. Describe how the eligible agency will support effective and meaningful collaboration between secondary schools, postsecondary institutions, and employers to provide students with experience in, and understanding of, all aspects of an industry, which may include work-based learning such as internships, mentorships, simulated work environments, and other hands-on or inquiry-based learning activities; and***

Work-based learning (WBL) allows students to apply their skills in a real-world setting and build competencies that will make them successful in their future careers. Therefore, RIDE and the CTE Board require that all CTE programs in the state include work-based learning.

The CTE Board has adopted the GWB Work-Based Learning Guidance in its standards for programs. Work-based learning in Rhode Island must meet the standards created by the Governor’s Workforce Board’s (GWB) guidance. CTE programs must also meet any additional work-based learning requirements included in the CTE Board Standards for their career field.

The GWB defines a work-based learning activity as a planned, structured learning experience that provides youth (ages 14-24, in school or out-of-school) with real-life or simulated work experiences where they can develop and apply academic, technical, and essential skills; and contributes to the achievement of their postsecondary and employment goal(s). The GWB is employing a flexible definition of WBL, encompassing the activities below:

* **Internship:** A position for a student or trainee to work in an organization, sometimes without pay, to gain work experience, satisfy requirements for a credential, and/or gain course credit.
* **Apprenticeship:** Highly-formal job training experience that involves studying with a master of the trade on the job.
* **Service learning:** A program or project which combines community service with an outside organization with a structured opportunity for reflection about that service, emphasizing the connections between service experiences and academic learning.
* **School-based enterprise:** Students produce and sell goods or services in the school and learn about business skills and entrepreneurship. This may be part of an entrepreneurship course, and a business professional may serve as a mentor and advisor for the enterprise.
* **Industry project:** Individual, group, or class-wide projects in which students address a real-world, industry-focused question or problem with the guidance of industry professionals.

The GWB recommends that schools, districts, industry partners, businesses, community-based organizations, and others engaged in work-based learning design and implement activities which are safe, follow all State and Federal labor laws, allow students to earn academic credit and/or wages, and meet standards for quality outlined below, and in the additional detailed work-based learning guidance document.

* **Rigorous:** Skill-based and tied to measurable outcomes.  The experience should allow a student to gain measurable skills, whether those be essential skills (also known as professional skills, soft skills, or 21st century skills) or hard technical skills.  The entire activity, including corresponding classroom time, should encompass a minimum of eighty hours.
* **Relevant:** Connected to a student’s interests, as indicated in his/her Individualized Learning Plan (ILP) and to the real world of work.  Projects and tasks should mirror those that exist in a real workplace, and should align to Priority Sectors in Rhode Island.
* **Reflective:** Engages the student in reflection and analysis throughout and after the experience, including guided self-reflection (for example, through the ILP process) and meaningful evaluations from the industry professionals.  In this process, students should connect the work-based learning experience to their academic work as well as future professional and educational goals.
* **Interactive:** Providing multiple and extended opportunities for students to interact with industry professionals, whether as supervisors, mentors, advisors, or collaborators.
* **Integrated:** Connected with the student’s school-based curriculum. A work-based learning experience is a practical application of academic and/or technical learning and should allow the student to practice the theory learned in the classroom in a real-world setting.

***II.B.2.c.vii. Describe how the eligible agency will improve outcomes and reduce performance gaps for CTE concentrators, including those who are members of special populations.  (Section 122(d)(4)(C) of Perkins V)***

 RIDE will ensure equal outcomes to approved CTE programs of study and activities assisted under this Act for special populations through:

* The **program approval process** which considers program admission, enrollment and retention policies.
* The **program accountability system** which reports disaggregated data whenever possible to identify participation and/or performance gaps by student population. RIDE will require programs that have consistent participation or performance gaps to conduct a root cause analysis and address the issue to continue to qualify for funding for the program.
* **State-coordinated communication** through a central information and enrollment platform to be developed in FY20 and FY21.
* RIDE will publish **CTE Program Report Cards** annually. These reports require breakouts by student population. These reports will help students and families make choices about the right opportunity for their needs, especially for members of special populations and will help schools to determine gaps and needs for program improvement.

Equity Grants

For programs for which the data shows that students of special populations are not participating or succeeding, RIDE will offer “Equity Grants” – grants with the objective of closing participation or performance gaps. These grants require applicants to analyze program data, determine a root cause for any participation or performance gap by any student subgroup, and propose an actionable, sustainable solution for addressing the identified gap. Applicants must be able to provide lessons learned and/or materials to support other schools in implementing the action if successful. Ultimately, this strategy will create a database of tested strategies for ensuring equity of access, participation, and performance of all student subgroups. RIDE will consult the CTE Board in making its funding decisions and reporting on outcomes.

This grant program will be available to schools through Perkins Reserve Funds. Grants support the development of resources that can be shared with schools around the state in support of closing participation and performance gaps. Eligible recipients (including secondary and postsecondary applications) must first complete a root cause analysis, then develop a research-based approach to addressing the program. Applicants may then submit a proposal to implement the proposed solution. As a requirement of the grants, the recipient must develop a related toolkit for potential future application and/or lessons learned and analysis of information in cases where improvement was not observed.

The outcomes of the Equity Grant program will live in a database available to educators and administrators with the intent of amplifying financial impact of the grant investment, and ultimately creating a library of proven approaches to participation and/or performance gaps.

Additionally, the CTE Program Report Card reports disaggregated data whenever possible to identify participation and/or performance gaps by student population. RIDE may require programs that have consistent participation or performance gaps to conduct a root cause analysis and address the issue to continue to qualify for funding for the program.

***II.B.2.d. Describe how the eligible agency, if it chooses to do so, will include the opportunity for secondary school students to participate in dual or concurrent enrollment programs, early college high school, or competency-based education.  (Section 122(d)(4)(D) of Perkins V)***

 RIDE will include the opportunity for secondary school students to participate in dual or concurrent enrollment programs and/or early college high school through:

PrepareRI Dual Enrollment Fund

[Rhode Island General Law 16-100-3(a)](http://webserver.rilin.state.ri.us/Statutes/TITLE16/16-100/16-100-3.HTM) of 2012 mandated the creation of a statewide dual enrollment policy that increased access to dual, concurrent, and early college programs for all RI public school students. Further, annually since 2015, Rhode Island has included a fund, the PrepareRI Dual Enrollment Fund, to cover the tuition and fees for all students, thereby eliminating previously experienced financial barriers to the program. The fund includes covering tuition and fees for concurrent enrollment courses that have been embedded in CTE programs. Additional funding from Perkins supports the implementation of the CTE-related courses from the Community College of Rhode Island (CCRI).

Transcripted Credit Requirements

The CTE Board Standards for many career fields identify required postsecondary transcripted college credit requirements. Where identified, programs must demonstrate that all students have the opportunity to earn transcripted college credit to be approved as a state CTE program.

P-TECH

As of 2016, RIDE recognizes the Pathways in Technology Early College High School (P-TECH) model as a CTE program. As of the 2019-20 school year, RIDE has five established P-TECH programs in Rhode Island. Students from any district may enroll in these programs to pursue their high school diploma, an associate degree, and first-in-line employment opportunities with each respective industry partner.

Postsecondary Partnership Grants

Eligible postsecondary institutions may apply for Postsecondary Partnership Grants from Rhode Island’s Perkins Reserve Fund to better support transcripted, program-aligned college credit earned while in high school CTE programs, and industry-specific teacher professional development.

Updated Secondary School Regulations

As of 2014, Rhode Island adopted a competency-based model of student learning through the Rhode Island Council on Elementary and Secondary Education’s Regulations Governing Secondary Learning Environments. Since that time, Rhode Island has supported schools in adopting competency-based approaches through partnerships with the Center for Collaborative Education and the Nellie Mae Foundation, the Rhode Island Foundation and other partners.

***II.B.2.e. Describe how the eligible agency will involve parents, academic and career and technical education teachers, administrators, faculty, career guidance and academic counselors, local business (including small businesses), labor organizations, and representatives of Indian Tribes and Tribal organizations, as appropriate, in the planning, development, implementation, and evaluation of its career and technical education programs.  (Section 122(d) (12) of Perkins V)***

As previously described, RIDE will involve parents, academic and CTE teachers, administrators, faculty, career guidance and academic counselors, local business (including small businesses), labor organizations, and representatives of Indian Tribes and Tribal organizations, as appropriate, in the planning, development, implementation, and evaluation of its CTE programs, through:

•          The public publishing of a central enrollment and information system

•          The public publishing of CTE Program Report Cards

•          Public CTE Board meetings and CTE Board Advisories meetings

Further, since fall 2017, RIDE has hosted a public event, known as the PrepareRI Summit, which serves as an opportunity for sharing opportunities and engaging various stakeholders in state priorities regarding college and career readiness. As part of the PrepareRI initiative, Rhode Island has hired PrepareRI Ambassadors – parents, community leaders, educators, and industry representatives – to take on discrete projects to increase engagement with specific communities, develop toolkits for implementing state initiatives, and provide stakeholder voice in policy and program development. PrepareRI Ambassadors lead sessions at the PrepareRI Summits to gather input and/or share out their projects with the state

***II.B.2.f. Include a copy of the local application template that the eligible agency will require eligible recipients to submit pursuant to section 134(b) of Perkins V.***

 Perkins V Funding Application

OVERVIEW

CTE career preparation programs, initiatives, and planning activities must include a budget and budget narrative detailing how the CTE program funds will be budgeted to achieve the desired goals as described in the Comprehensive Local Needs Assessment (Needs Assessment). All funding applications must also indicate the milestones that will be used to progress monitor and track progress toward continuous improvement.

This application picks up where the Needs Assessment left off. How funds are budgeted for the 2020-21 program year should reflect year 1 expenditures of the two-year Theory of Action described in Section 6 of the Needs Assessment.

 Submit your application no later than 11:59PM June 14th.

INSTRUCTIONS

The funding application is divided into the following sections:

Section 1: Alignment Analysis

Section 2: Budget (Excel File)

Section 3: Budget Narrative

Section 4: Progress Monitoring

 SECTION 1: Needs Assessment Alignment Analysis

1. Refer to Section 6, Part 1 and review the 1-sentence summaries provided.

2. Next, for each of the SMART goals identified in Part 2 of Section 6, provide a summary of the way(s) in which funding priorities align to each goal. Limit your responses to 100 words or less.

SMART Goal 1 Alignment

SMART Goal 2 Alignment

SMART Goal 3 Alignment

SMART Goal 4 Alignment

SMART Goal 5 Alignment

SECTION 2: Budget

Provide a full accounting of how you intend to fund your CTE programs to achieve your goals. Include both state categorical and federal Perkins V funding in the budget below.

As a reminder, Effective July 1, 2020, CTE Categorical funding shall be invested into the program that generated the funds. Funds may not be reallocated to different CTE programs within the same school. Each recipient will be required to submit an annual expenditure report detailing how funding was invested. LEAs may request a waiver from some or all of this requirement. Waiver requests must be made to RIDE, which will evaluate the request based on standards set by the CTE Board, and notify the CTE Board of any waivers granted at the CTE Board’s next meeting.

CTE Funding Budget Summary (by Object Code/UCOA) – Excel Spreadsheet

|  | State Categorical | Perkins V Federal Funding | Total Budgeted |
| --- | --- | --- | --- |
| 51000-Personnel Services-Compensation |  |  |  |
| 52000-Personnel Services-Employee Benefits |  |  |  |
| 53000-Purchased Professional & Technical Services |  |  |  |
| 54000-Purchased Property Services |  |  |  |
| 55000-Other Purchased Services |  |  |  |
| 56000-Supplies & Materials |  |  |  |
| 57000-Property & Equipment |  |  |  |
| 58000-Miscellaneous |  |  |  |
| 60000-Indirect Costs |  |  |  |

Need to provide indirect cost rate.

 SECTION 3: Budget Narrative

Part 1: Describe how you plan to utilize state categorical and Perkins funds to support key program components. Limit your response for each component to 100 words or less.

1. Meeting CTE Board Standards

2. Work-based learning opportunities (5 areas)

3. Advanced coursework and/or industry credentials

4. Teacher recruitment, training and ongoing professional development

5. Property/Equipment

6. Program Scope

7. Equity, Access & Participation Supports

8. Individualized Learning Plan

Part 2, Budget Rationale: Why is this the most efficient use of funds for the 2020-21 program year? In what ways does the budget support the highest “return on investment” or ROI?

SECTION 4: Progress Monitoring

Describe the desired outcomes as well as the frequency and process by which you will reflect on those outcomes? These may be the SMART goals you created in the Needs Assessment or a “milestone” designed to measure growth towards achieving a goal by the end of the 2021-22 school year. Consider what data you will routinely analyze as a part of progress monitoring and use the template below to share your plan.

2020-21 Progress Monitoring Plan

| Outcome 1: |  |
| --- | --- |
| Data to Examine: | Frequency: |
| Outcome 2: |  |
| Data to Examine: | Frequency: |
| Outcome 3: |  |
| Data to Examine: | Frequency: |
| Outcome 4: |  |
| Data to Examine: | Frequency: |
| Outcome 5: |  |
| Data to Examine: | Frequency: |

***II.B.2.g Include a copy of the local needs assessment template that the eligible agency will require eligible recipients to submit pursuant to section 134(c) of Perkins V.***

Comprehensive Local Needs Assessment

OVERVIEW

The Strengthening Career and Technical Education for the 21st Century Act, otherwise known as Perkins V, was signed into law in July 2018. This legislation reauthorized the Carl D. Perkins Career and Technical Education Act of 2006 which governs the federal support for career and technical education (CTE). One of the most significant changes introduced in Perkins V is the new Comprehensive Local Needs Assessment (Needs Assessment).

Specifically, the legislation states, “To be eligible to receive financial assistance under this part, an eligible recipient shall — (A) conduct a comprehensive local needs assessment related to career and technical education and include the results of the needs assessment in the local application submitted under subsection (a); and (B) not less than once every 2 years, update such comprehensive local needs assessment.”

Section 134(c) of Perkins V describes requirements for the Needs Assessment. Secondary and postsecondary eligible recipients shall include the following steps in the process:

1. Organize group of stakeholders

2. Analyze student and labor market data

3. Evaluate current CTE programs

4. Create strategies and actionable activities

Purpose

The purpose of the Needs Assessment is to align planning, spending, and accountability activities under Perkins V to support high-quality CTE programs. As part of the Rhode Island CTE program approval process, applicants must first submit a Needs Assessment to inform the local application. The program approval application due later this spring will build on this work and explain how the program will address the needs identified in the Needs Assessment. Any gap areas identified through the development of the Needs Assessment should directly align to the goals and action steps in the RI Local Application.

Stakeholder Engagement

The Needs Assessment should be developed in partnership with a diverse group of stakeholders. The law specifies that, at a minimum, the following stakeholders should be included:

* CTE program representatives at the secondary and postsecondary levels, including teachers, faculty, administrators, career guidance and advisement professionals, and other staff
* State or local workforce development board representatives
* Representatives from a range of local businesses and industries
* Parents and students
* Representatives of special populations

During school closures due to COVID-19, LEAs are encouraged to leverage virtual meetings and stakeholder conference calls to gather feedback. RIDE acknowledges that these are unusual times. For this reason, LEAs may want to also review notes and insights from previous meetings with local advisories, industry partners and the CTE Board of Trustees. Stakeholder engagement does not have to occur all at once, nor does it have to include every stakeholder in a single meeting.

Data

A strong CLNA is based on data. The RI [Report Card](https://reportcard.ride.ri.gov/) site provides Diploma Plus metrics, including a Postsecondary Success Index Score which includes the number of 2018 graduates that earned a CTE credential. Dive deeper and examine program concentrator data in aggregate and by subgroup. Graduation rates, proficiency percentages and program enrollment data are required data points for every Needs Assessment.

Alignment analysis of local programs to [CTE Career Field Standards](https://www.ride.ri.gov/Portals/0/Uploads/Documents/Students-and-Families-Great-Schools/Educational-Programming/Career-and-Tech/CTEBOT_Support_Standards%20List%20-%20Updated%2009.19.19.docx.pdf?ver=2019-09-19-130406-463) as well as the [RIDE CTE Program Standards](https://www.ride.ri.gov/Portals/0/Uploads/Documents/Students-and-Families-Great-Schools/Educational-Programming/Career-and-Tech/Revised%20Standards%20and%20Evidence%202015F.pdf?ver=2015-06-30-152436-017) are all data to consider.

Root Cause Analysis

A needs assessment attempts to identify the underlying factors or “root causes” that explain why a performance gap exists. There are many protocols and frameworks for conducting a root cause analysis, all of which ultimately boil down to asking "why?" until useful responses stop coming or the solution falls outside of District/Center control2. Engage stakeholders through this process or a similar one to examine data and gather feedback.

Needs Assessment Instructions

Rhode Island CTE programs exist to provide all Rhode Island students with skills, experiences, and credentials that will propel their success in life and the workforce. The Needs Assessment is a tool designed to support LEA’s through a process that will identify the underlying factors within a school or district’s control that explain any gaps in CTE programming, quality and access.  Any conclusions from this process will then become critical inputs for the Program Approval Application.

The Needs Assessment is divided into the following sections:

* Student Performance: the extent to which students are currently achieving the necessary skills and indicators of readiness, both in aggregate and by subgroups
* Labor Market Needs: the skills and areas where students will find opportunities for success in the future
* Student Access & Participation: the extent to which all students have access to and are accessing CTE
* Program Scope & Alignment: the ability of current programs to prepare students for success
* Educator Recruitment, Retention & Training: the tools and experiences educators will require in order to prepare students for the opportunities of the future
* Conclusions: a summary of the findings that have surfaced as a result of the analysis and the theory of action that will transform CTE programs in your community.

Complete the [Needs Assessment Survey](https://www.surveymonkey.com/r/LMFMP8X) by 11:59 p.m. on June 14, 2020 to share insights and highlights from data dives and stakeholder feedback. Instructions are provided in more detail below.

Please Note:

* Each section includes short answer questions as well as a long answer summary. Complete all questions.
* The survey cannot be saved and continued at a later date. Instead, use this document and supporting links to prepare responses in advance and paste them into the form.
* Additional resources can be found on the [CTE landing page](https://www.ride.ri.gov/StudentsFamilies/EducationPrograms/CareerTechnicalEducation.aspx), including a Briefing Deck and Frequently Asked Questions (FAQs).

Cover Sheet

Be prepared to provide basic contact information for the District/Institution as well as contact information for the individual completing the form. Two data points are requested:

* List the approved CTE programs that currently operate in the district/institution and also provide for which CTE Board Standard each has been approved.
* What is the current total enrollment for all CTE programs in the district/institution?

Stakeholder Engagement Contact Information

Provide the names and contact information for those individuals who cEontributed to the Needs Assessment. Download and complete the [Stakeholder Engagement Tracker](https://drive.google.com/file/d/1lmpoUWhDSkL8LwQCeGvSBYvGMcfjf_5d/view?usp=sharing) in advance and upload it when you complete the survey. Include the District/Center Name in the name of file.

SECTION 1: Student Performance

How well are our students performing? What can we do to increase performance across all subgroups?

Short Answer Questions:

Using the [RI Report Card](https://reportcard.ride.ri.gov/) Postsecondary Success Index data and [CTE Standards](https://www.ride.ri.gov/Portals/0/Uploads/Documents/Students-and-Families-Great-Schools/Educational-Programming/Career-and-Tech/CTEBOT_Support_Standards%20List%20-%20Updated%2009.19.19.docx.pdf?ver=2019-09-19-130406-463), answer the following questions:

* How many of our CTE concentrators earning industry-recognized credentials, as recognized in the CTE Board Standards? Do you see any patterns in who earns industry-recognized credentials and who does not?
* Are specific subgroups more or less likely to earn industry recognized credentials? What is driving those differences in performances?

Using the local CTE performance data (e.g. concentrator achievement by program, by subgroup, by priority sector, etc.), answer the following questions:

* How are learners from different genders, races and ethnicities performing in our programs? Break this analysis down at the LEA level, program level, and disaggregate by Priority Sector programs and non-Priority Sector programs and share high level insights.
* (Secondary Only) Which CTE concentrators are succeeding in the CTE course sequences’ academic coursework (including advanced coursework and dual/concurrent enrollment)? Have specific subgroups been more or less successful?

Analysis Summary (Long Answer): What root causes were uncovered from the prompts above? How do you know? Share data and stakeholder feedback as further evidence to support your analysis.

SECTION 2: Labor Market Alignment

How well are programs aligned with state, regional and local workforce and career needs?

 Short Answer Questions:

1. What lessons have we learned from participants of our program about how our program prepares students for the labor market? What patterns do we see with the skills they demonstrate or jobs they end up doing?

Examine [Rhode Island Labor Market](http://www.dlt.ri.gov/lmi/) information and review pages 35-61 of the [Rhode Island Commerce Corporation](https://commerceri.com/wp-content/uploads/2020/02/Rhode-Island-Innovates-2020.pdf) report and answer the following questions:

1. What are the highest projected growth industries in our region? What occupations are part of that industry?
2. How are the CTE programs we offered aligned to the demand? How do we know?

Section 2 Analysis Summary (Long Answer): Provide a summary of lessons learned, patterns of success and areas of concern from the prompts above? Share data and stakeholder feedback as further evidence to support your analysis.

 SECTION 3: Student Access & Participation

Do we ensure that all students have access and support to our CTE programs?

 Short Answer Questions:

Examine local data to answer the questions below, including:

* Program application (student-level) data,
* Acceptance (student-level) data
* Program Completion (student-level) data
* District [Individualized Learning Plan](https://www.ride.ri.gov/StudentsFamilies/EducationPrograms/SchoolCounseling.aspx#16611424-individual-learning-plans)

1. Who is currently entering (or applying to enter) our CTE programs? In your response, consider whether all student subgroups are applying to or entering programs proportionately to the school population.
2. How does participation in some programs compare to other CTE programs we have? What are the differences? Does participation match the demographics of our school?
3. What efforts have been made to recruit and retain diverse populations of learners into our programs, particularly in programs leading to Priority Sector career fields and occupations?
4. What barriers might students requiring extra supports (credit recovery, language acquisition programs, and or developmental core content) face in accessing our programs? What supports do we provide to serve students with special needs?

Secondary-only prompts:

1. If we accept students from out of district, are some student subgroups more or less represented in who applies or attends?
2. Are students utilizing their Individual Learning Plans and school counseling to determine a program? What evidence do we have?
3. Are middle school career exploration programs supporting all or some of our programs?

 Section 3 Analysis Summary (Long Answer): What potential root causes were uncovered from the prompts above? How do you know? Share data and stakeholder feedback as further evidence to support your analysis.

 SECTION 4: Program Scope & Alignment

Are our current programs able to meet the needs of students to enter high wage, high demand career opportunities? For detailed information about secondary funding eligibility, see Section II.C.1 of the [Perkins V State Plan](https://www.ride.ri.gov/StudentsFamilies/EducationPrograms/CareerTechnicalEducation.aspx#12211763-perkins-state-plan-for-2020-2025).

Short Answer Questions:

Using [CTE Board Standards](https://www.ride.ri.gov/Portals/0/Uploads/Documents/Students-and-Families-Great-Schools/Educational-Programming/Career-and-Tech/CTEBOT_Support_Standards%20List%20-%20Updated%2009.19.19.docx.pdf?ver=2019-09-19-130406-463), answer the following questions:

1. Are our programs meeting the full requirements of the CTE Board Standards for which they were approved? How could we better meet or exceed the standards included in that document?
2. How do course offerings in each program build upon each other, from basic knowledge and skills to more complex knowledge and skills?

Using the [Governor’s Workforce Board Work-based Learning Activities and Standards Guidelines](https://gwb.ri.gov/wp-content/uploads/2017/06/GWB-WBL-Guidance_COMBINED.pdf?189db0), answer the following questions:

1. What work-based learning experiences (industry projects, service learning, internships, apprenticeships and/or school-based enterprises) are available within our programs?
2. Are learning experiences of sufficient scope to meet the needs of all students? How do we know?

Section 4 Analysis Summary (Long Answer): Provide a summary of lessons learned, patterns of success and areas of concern. Share data and stakeholder feedback as further evidence to support your analysis.

SECTION 5: Educator Recruitment, Retention & Training

How can we improve recruitment, retention, and training of CTE teachers, faculty, specialized instructional support personnel, paraprofessionals, and career guidance and academic counselors, including individuals in groups underrepresented in such professions?

 Short Answer Questions:

Using [CTE teacher certification requirements](https://www.ride.ri.gov/StudentsFamilies/EducationPrograms/CareerTechnicalEducation.aspx#12211324-cte-teacher-certification), the [RIDE eCert](http://ecert.ride.ri.gov/public/) portal, and local data sources (i.e. teacher Professional Learning Units, surveys, professional development calendar, etc.), answer the following questions:

1. Do we have adequate staff credentialed to teach our CTE programs? How do we know? What gaps exist, if any, and what is our plan to minimize them?
2. What processes are in place to recruit, induct and retain faculty and staff? Are these processes efficient and effective, especially for instructors coming from industry? How recently have teachers had program-related work experience?
3. What steps are we taking to ensure our staff/faculty reflect the demographic makeup of our student body?
4. How often do we offer regular, substantive professional development opportunities for faculty, staff and administrators, including involvement in student advising? How effective are these experiences at improving student outcomes? What evidence do we have?
5. Are there patterns of higher CTE concentrator achievement in programs that have educators with specific education type, certification types, and specific types/lengths of experience or professional development opportunities?

Section 5 Analysis Summary (Long Answer): What potential root causes were uncovered from the prompts above? How do you know? Share data and stakeholder feedback as further evidence to support your analysis.

SECTION 6: Conclusions

Now that you have thoroughly examined the data and discussed the underlying factors that explain any gaps in current programs (and highlights the strengths as well), create a one page summary to guide your strategy moving forward. Organize the one-pager into two parts.

Part 1: Needs Assessment Findings

Provide a 1-sentence summary of your findings for each section of your needs assessment.

* Based on your observations of the data and determination of root causes of those observations from each component, what conclusions are you drawing about the needs of your current program? Which programs are the strongest? Which need to be transformed or retired? What feedback and/or data provided the most “food for thought”?

 Part 2: Theory of Action

Create a drawing or outline to summarize what will happen next to transform CTE in your community. Provide 1) an aspirational vision for CTE in your community; 3-5 key levers or strategies that you will enact to realize that vision; and the 3-5 SMART goals you are aiming for to ultimately transform CTE in your community.

Think about the theory of action as an “if-then” scenario. The “ifs” are the 3-5 key levers or strategies while the “thens” are the 3-5 corresponding goals you are you are aiming to achieve.

As a reminder, SMART goals are Specific, Measurable, Achievable, Relevant and Time bound.

Use the following template to organize the one-pager:

| Summary |
| --- |
| Section 1. Student Performance: |
| Section 2. Labor Market Alignment: |
| Section 3. Student Access & Participation: |
| Section 4. Program Scope & Alignment: |
| Section 5. Teacher Recruitment, Retention & Training: |
| **Vision:** |
| Strategies |
| 1. |
| 2. |
| 3. |
| 4. |
| 5. |
|  |

***II.B.2.h Provide the definition for “size, scope, and quality” that the eligible agency will use to make funds available to eligible recipients pursuant to section 135(B) of Perkins V.***

 Size, Scope, & Quality: Secondary

Perkins funds may only be spent on CTE programs that have been state-approved or have received preapproval. Preapproved programs will have 18 months to receive full state approval.

In order to be considered for state approval, all secondary CTE programs must include all of the following:

•          Include at least three non-duplicative courses that meet CTE Board Standards

•          Meet RIDE’s CTE Regulations from 2012

•          Meet CTE Board Standards, culminating in students earning CTE Board-recognized credentials or credit

•          Include work-based learning experience for every student aligned to Governor’s Workforce Board (GWB) guidance and, as applicable, any CTE Board work-based learning standards

•          Evidence that all CTE teachers have proper certification

•          Evidence that students are provided opportunities to demonstrate employability skills

Additionally, LEAs must have:

•          At least one state-approved program in a Priority Sector; or be developing such a program, receive pre-approval from RIDE and the CTE Board, and submit it for approval within 18 months of first fund use.

•          Non-discriminatory admissions policies

For more detailed information about secondary funding eligibility, see Section II.C.1 on page 58.

Size, Scope, & Quality: Postsecondary

The only postsecondary institution receiving local formula funds in Rhode Island is the Community College of Rhode Island (CCRI). Other postsecondary institutions in Rhode Island, including both public and private institutions, may receive Perkins funds through the Reserve Fund, via competitive Postsecondary Partnership Grants.

All courses for secondary school students paid for by Perkins dollars must offer students transcripted academic credit that is transferrable to other universities. Courses that offer articulated credit (that is, credit which is only accepted at the issuing postsecondary institution) are not eligible for Perkins funds.

Postsecondary Programs for K-12 Students

Funded programs may offer courses via dual enrollment or concurrent enrollment. Dual enrollment courses are courses offered at the postsecondary institution. Concurrent enrollment courses are courses offered at the high school by an instructor approved by the postsecondary institution. To be eligible for Perkins funds, concurrent enrollment courses must meet the same standards of quality and rigor as dual enrollment courses. Funded programs may be asked to present to the CTE Board.

Postsecondary Programs for Postsecondary Students

College-level programming must lead to students earning industry-recognized credentials of value. Programs must embed work-based learning opportunities and employability skills training aligned to relevant state standards. Programs must engage students in some form of career counseling. Funded programs may be asked to present to the CTE Board.

For more detailed information about postsecondary funding eligibility, see Section II.C.1.

**II.B.3. Meeting the Needs of Special Populations**

***II.B.3.a. Describe the eligible agency’s program strategies for special populations, including a description of how individuals who are members of special populations—***

1. ***will be provided with equal access to activities assisted under this Act;***
2. ***will not be discriminated against on the basis of status as a member of a special population;***
3. ***will be provided with programs designed to enable individuals who are members of special populations to meet or exceed State determined levels of performance described in section 113, and prepare special populations for further learning and for high-skill, high-wage, or in-demand industry sectors or occupations;***
4. ***will be provided with appropriate accommodations; and***
5. ***will be provided instruction and work-based learning opportunities in integrated settings that support competitive, integrated employment. (Section 122(d)(9) of Perkins V)***

 RIDE has long fought to ensure students with disabilities receive the support they need to meet high expectations, and exit the public education system as productive citizens, lifelong learners, and contributing members of the workforce. RIDE strives to ensure that individuals with diverse learning needs and children receiving special education services are provided access to a rigorous public education—including, but not limited to, CTE programs—and that schools develop effective strategies for meeting the needs of these unique learners.

RIDE is responsible for advancing the education of:

•          Children and youth with disabilities who require special education.

•          Children and youth who are English Language Learners (ELL), Multi-Lingual Learners (MLL), or Limited English Proficient/Non-English Speaking (LEP).

•          Children and youth who are disadvantaged and/or participate in Title I, who are experiencing homelessness, and/or who are neglected, delinquent, or at-risk.

•          Children and youth who are gifted or Learning Beyond Grade Level.

•          Children and youth who learn through Expanded Learning Opportunities (ELOs). This includes after-school or summer programs, which support learning opportunities for students outside of the regular school day or school year.

•          Children and youth whose health and safety are advanced through nurturing school environments.

RIDE is currently working on a Multi-Tiered System of Support (MTSS), which is a framework for ensuring all students receive the support they need to be successful. This framework ensures that all students are supported for meeting academic, behavioral, and social-emotional outcomes. CTE is for all students, and that means all students—including multilingual learners, differently-abled students, and any student who needs more support to be successful. RIDE believes any student can be successful, if given the proper supports.

In a Multi-Tiered System of Support, all students have equitable access to strong, effective core instruction using high-quality curriculum and differentiated instructional practices at Tier 1, evidence-based group interventions at Tier 2, and intensive, evidence-based interventions at Tier 3. (See diagram below.) By providing these supports in schools and communities where children and youth in special populations reside and visit, Rhode Island’s education system is setting students up for success.

Multi-Tiered System of Support (MTSS)

RIDE aims to be a champion for educational equity, and has committed to lead the way in addressing inequities of the past by focusing on providing learning opportunities for all students.  RIDE will maintain a relentless focus on student outcomes that ensures stakeholders deliver on the promise of equity for all students. RIDE will strive to ensure individuals of special populations are able to access CTE programs, including programs in Priority Sectors. All students should be able to earn credentials and complete work-based learning experiences that prepare them for further learning and for competitive, integrated employment. RIDE will achieve this vision for inclusive CTE through the following mechanisms:

•          In applications for the creation or renewal of CTE programs, programs must provide evidence that they provide adequate supports, staffing, and/or resources for students with Individualized Education Plans (IEPs).

•          Through yearly reporting and applications for new/renewed programs, LEAs must demonstrate that any program utilizing Perkins funding maintains inclusive, nondiscriminatory admission, enrollment, and retention policies. This includes both in-district and out-of-district student enrollment.

•          RIDE will increase communication and access to program opportunities through a statewide unified enrollment and information system for students. RIDE will begin rolling out this system in FY21.

•          In the annual reports required of all programs receiving Perkins formula funds, programs must report disaggregated student outcome data. RIDE and the CTE Board may ask programs with participation or performances gaps to conduct a needs analysis and action plan.

•          RIDE will provide technical assistance to support schools in analyzing disaggregated program data, and implementing evidence-backed strategies for supporting student from special populations.

•          RIDE will provide professional development to help special educators, counselors, teachers, and other school personnel work with students to align IEPs with Individual Learning Plans (ILPs) that provide students with a roadmap for how to develop the academic, career, social-emotional, and employability skills they need for postsecondary success.

•          RIDE will ensure CTE programs meet federal Office of Civil Rights (OCR) requirements through regular reviews, as overseen by OCR.

Schools should provide access to CTE programs to members of special populations in accordance with their interests and career goals —not based on their status as members of a special population. Perkins fund recipients are encouraged to work together to assess performance data for all students across all special populations, to identify performance gaps and trends, and subsequently select strategies to address any inequalities in student performance.

RIDE intends to use the annual Equity Grants program, funded through Perkins Reserve Funds, to encourage schools to develop innovative supports for students from special populations. During and after the term of their Equity Grant, recipients will work with RIDE to provide professional development to other schools that are struggling with similar equity gaps. This process will help develop a community of practice that works together to spread best practices for serving students with diverse needs. The Equity Grants should thus help Rhode Island develop reality-tested resources for how to serve all students in CTE programs, and help create a culture among Rhode Island’s CTE programs that prioritizes equity.

**II.B.4. Preparing Teachers and Faculty**

***II.B.4.a. Describe how the eligible agency will support the recruitment and preparation of teachers, including special education teachers, faculty, school principals, administrators, specialized instructional support personnel, and paraprofessionals to provide career and technical education instruction, leadership, and support, including professional development that provides the knowledge and skills needed to work with and improve instruction for special populations. (Section 122(d)(6) of Perkins V)***

CTE Teacher Pipeline

RIDE will support the recruitment and preparation of teachers, including special education teachers, faculty, school principals, administrators, specialized instructional support personnel, and paraprofessionals, to provide world-class CTE instruction in Rhode Island. RIDE is adopting a few strategies, outlined below, to build the teaching corps that Rhode Island’s CTE students deserve.

CTE Teacher Certification

RIDE has been working to make it easier for schools to hire qualified professionals to teach CTE in Rhode Island. In December 2019, the Council on Elementary and Secondary education passed revisions to the teacher certification regulations to better align RIDE’s requirements with industry requirements. Previously, all CTE teachers were required to hold a bachelor’s degree to become a certified teacher, regardless of their level of expertise in their career field or the standard degree expectation for that field. This policy had the unintended effect of keeping many qualified mid-career professionals from teaching CTE programs.

The revised regulations provide more flexibility around the degree requirements for CTE teachers. CTE teachers must have whatever level degree is typical for the career field they teach. For example, CTE programs in many trade professions do not require a bachelor’s degree, but computer science programs do require one. To determine the degree requirements expected by industry, RIDE adopted the recommendations of industry and education professionals in each of the career field Advisories of the state CTE Board.

CTE Teacher Grant

RIDE will leverage part of the secondary Perkins Reserve Fund for CTE Teacher Grants, which support the certification and training of CTE teachers. For more information, see section II.C.2.a on page 66.

CTE Teacher Certification at Roger Williams University

A key component of developing a robust CTE teacher pipeline is making CTE teacher certification programs easily accessible to potential teachers. Unfortunately, until a few years ago, Rhode Island did not have any approved CTE teacher certification programs in the entire state. To address that issue, RIDE released a request for proposal (RFP) to launch an in-state CTE teacher certification program. This led to the creation of the CTE Teacher Certification program at Roger Williams University, a private college in Rhode Island. The program is located at Roger Williams’s University College and provides a competency-based education designed with working adults in mind. Assignments are designed to be practical, job-embedded, and closely connected to classroom learning.  Micro-courses are held each month with additional learning experiences, resources, and assignments available at all times. The program launched in fall 2019.

Teacher Endorsements

Under the revised teacher certification regulations passed in 2019, RIDE created the opportunity for teachers to earn micro-credentials, called “endorsements,” to demonstrate expertise in a particular subject area. In 2020, the Council on Elementary and Secondary Education approved a Computer Science Endorsement. This endorsement was created to encourage and recognize teachers who have demonstrated expertise in computer science, one of the CTE Priority Sectors RIDE is hoping to expand. RIDE will evaluate the impact of the Computer Science Endorsement on the state’s computer science teaching corps, to determine if such a similar approach should be adopted for other CTE career fields.

Professional Learning

While Rhode Island needs a strong pipeline to get qualified CTE teachers in front of students, these teachers also need ongoing learning and professional development to be effective. RIDE understands that both teachers and students should engage in a process of continuous learning and improvement.

PrepareRI Summits

Starting in fall 2017, RIDE and the PrepareRI partner agencies began hosting PrepareRI Summits, a statewide conference for leaders from schools, industries, and colleges. At the Summits, these cross-sector stakeholders meet each other and learn about state and local efforts to build career pathways for Rhode Island’s young people.

Career Coordinators Network

In 2018, RIDE asked every high school in Rhode Island to designate a “Career Coordinator,” a staff member who serves as the point person for employer partnerships and coordinates work-based learning. As of January 2020, nearly 90% of Rhode Island’s high schools had designated a Career Coordinator and submitted that person’s contact information to RIDE. Beginning in the 2018-19 school year, RIDE began convening a monthly statewide professional development session for Career Coordinators, dubbed the Career Coordinator Network. This forum allows RIDE to share information related to career pathways work with personnel at nearly every high school in the state and creates a professional learning community focused on sharing best practices.

Professional Learning Communities for Individual Learning Plans

Starting in the 2019-20 school year, RIDE began hosting a Professional Learning Community (PLC) for school counselors. The focus of these PLCs is helping school counselors work with students to develop Individual Learning Plans (ILPs) that help students plan how to navigate their K-12 experience to prepare for a career aligned to their passions.

#### c. Fiscal Responsibility

* 1. Describe the criteria and process for how the eligible agency will approve eligible recipients for funds under this Act, including how—
  + a. Each eligible recipient will promote academic achievement;
  + b. Each eligible recipient will promote skill attainment, including skill attainment that leads to a recognized postsecondary credential; and
  + c. Each eligible recipient will ensure the local needs assessment under section 134 takes into consideration local economic and education needs, including, where appropriate, in-demand industry sectors and occupations. (Section 122(d)(5) of Perkins V)
* 2. Describe how funds received by the eligible agency through the allotment made under section 111 of the Act will be distributed—
  + a. Among career and technical education at the secondary level, or career and technical education at the postsecondary and adult level, or both, including how such distribution will most effectively provide students with the skills needed to succeed in the workplace; and
  + b. Among any consortia that may be formed among secondary schools and eligible institutions, and how funds will be distributed among the members of the consortia, including the rationale for such distribution and how it will most effectively provide students with the skills needed to succeed in the workplace. (Section 122(d)(8) of Perkins V)
* 3. For the upcoming program year, provide the specific dollar allocations made available by the eligible agency for career and technical education programs and programs of study under section 131(a)-(e) of the Act and describe how these allocations are distributed to local educational agencies, areas career and technical education schools and educational service agencies within the State. (Section 131(g) of Perkins V)
* 4. For the upcoming program year, provide the specific dollar allocations made available by the eligible agency for career and technical education programs and programs of study under section 132(a) of the Act and describe how these allocations are distributed to eligible institutions and consortia of eligible institutions within the State.
* 5. Describe how the eligible agency will adjust the data used to make the allocations to reflect any changes in school district boundaries that may have occurred since the population and/or enrollment data was collected, and include local education agencies without geographical boundaries, such as charter schools and secondary schools funded by the Bureau of Indian Education. (Section 131(a)(3) of Perkins V)
* 6. If the eligible agency will submit an application for a waiver to the secondary allocation formula described in section 131(a)—
  + a. Include a proposal for such an alternative formula; and
  + b. Describe how the waiver demonstrates that a proposed alternative formula more effectively targets funds on the basis of poverty (as defined by the Office of Management and Budget and revised annually in accordance with section 673(2) of the Community Services Block Grant Act (42 U.S.C. 9902(2)) to local educational agencies with the State. (Section 131(b) of Perkins V)

Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).

* 7. If the eligible agency will submit an application for a waiver to the postsecondary allocation formula described in section 132(a)—
  + a. Include a proposal for such an alternative formula; and
  + b. Describe how the formula does not result in a distribution of funds to the eligible institutions or consortia with the State that have the highest numbers of economically disadvantaged individuals and that an alternative formula will result in such a distribution. (Section 132(b) of Perkins V)

Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).

* 8. Provide the State’s fiscal effort per student, or aggregate expenditures for the State, that will establish the baseline for the Secretary’s annual determination on whether the State has maintained its fiscal effort, and indicate whether the baseline is a continuing level or new level. If the baseline is new, please provide the fiscal effort per student, or aggregate expenditures for the State, for the preceding fiscal year. (Section 211(b)(1)(D) of Perkins V)

**II.C. Fiscal Responsibility**

***II.C.1. Describe the criteria and process for how the eligible agency will approve eligible recipients for funds under this Act, including how—***

***a) each eligible recipient will promote academic achievement;***

***b) each eligible recipient will promote skill attainment, including skill attainment that leads to a recognized postsecondary credential;***

Eligibility Criteria: Secondary Schools

State Approval

Perkins funds may only be spent on CTE programs that have been state-approved. Funds may be spent to seed new programs if the program has received pre-approval from RIDE and the CTE Board; such programs must be submitted for state approval within 18 months of first fund use.

All CTE programs must meet RIDE requirements for “size, scope, and quality” (see Section II.B.2.h on page 48 above. Specifically, programs must:

•          Include at least three non-duplicative courses and meet RIDE’s CTE Regulations from 2012

•          Align to CTE Board program standards, culminating in students earning CTE Board-recognized credentials or credit

•          Include work-based learning experience for every student aligned to Governor’s Workforce Board (GWB) guidance and any CTE Board work-based learning standards

•          Teach employability skills

The state approval process is designed to ensure that all CTE programs in the state provide students with skills that are actually valued by Rhode Island employers. The CTE Board Standards, which are developed by Industry Advisories consisting of representatives from both education and industry, set standards that include recognized postsecondary or industry credentials, as well as requirements regarding academic course sequences.

Priority Sectors

To be eligible for Perkins funds, LEAs must have at least one state-approved program in a Priority Sector, as defined in Rhode Island’s Long-Term Economic Development Plan and adopted by RIDE. If the LEA does not yet have a state-approved Priority Sector program, LEAs may receive Perkins funds if they receive pre-approval from RIDE and the CTE Board for a Priority Sector program; such programs must be submitted for full state approval within 18 months of first fund use.

The Perkins funds that LEAs receive do not need to be solely spent on the LEA’s Priority Sector programs; they may be spent on any state-approved CTE program within the LEA. By contrast, state CTE Categorical funds may only be used for CTE programs in Priority Sectors.

Admissions

Rhode Island’s CTE Regulations from 2012 allow students to enroll in any CTE program in the state, including those at high schools outside the LEA of their residence. To be eligible for Perkins funds, LEAs cannot have discriminatory admissions processes for their CTE programs. This includes restricting access based on race, gender, disability status (IEP), language, and/or income status.

Programs must report admissions requirements to RIDE and the number of students admitted/rejected from different student populations annually. RIDE and the CTE Board reserve the right to identify programs with admissions policies that have a disproportionate impact on student subpopulations, and will work with schools to develop admissions requirements that ensure all student groups are equitably served by CTE programs.

Use of Funds

RIDE and the CTE Board will issue use-of-funds guidance to support an effective use of Perkins formula funding. It will outline effective strategies for increasing the career readiness of youth.

Middle schools. Recipients will be eligible to use up to 10% of their Perkins allocation for career exploration activities and programs in grades 5 to 8. The primary objective of these allocations should be career exploration programming that helps middle school students identify which career fields and CTE programs interest them.

Non-instructional expenses. RIDE reserves the right to set a cap on the allowable percentage of Perkins funds spent on non-instructional expenses.

Funding Application

Rhode Island will release an annual application for Perkins funding. This application may include a narrative application, required evidence, and budget. The application’s focus will be how the program will use the funds to meet the CTE Board Standards and prepare students for career success. RIDE and the CTE Board are focused on maximizing the return on investment (ROI) of Perkins dollars on student outcomes.

RIDE and the CTE Board shall create a process for review of eligible recipients to present their annual funding application, proposed budget, and needs assessment to the CTE Board and RIDE. All programs may be required to follow this process; the CTE Board and RIDE will jointly decide which programs must follow this presentation process in a given year.

If programs need to modify their approved budgets, they must notify RIDE and the CTE Board. Major modifications require prior approval from RIDE.

Annual Reporting

All LEAs are required to submit data and a year-end report to RIDE every year. This data submission will be used for RIDE’s school-level Report Cards under ESSA, as well as for program-level CTE Program Report Cards.

If these annual reports indicate the program is not meeting expectations for student outcomes, RIDE and the CTE Board reserve the right to work with CTE programs to improve those outcomes.

Programs are required to report any changes to their program related to their ability to meet RIDE and CTE Board Standards. For example, if programs change the course sequence within the term of their approval, they must notify RIDE and CTE Board. If the new course sequence does not meet CTE Board Standard for which they were originally approved, they may lose their RIDE approval.

Eligibility Criteria: Postsecondary Institutions

The only postsecondary institution receiving local formula funds in Rhode Island is the Community College of Rhode Island (CCRI). Other postsecondary institutions in Rhode Island, including both public and private institutions, may receive Perkins funds through the Reserve Fund, via competitive Postsecondary Partnership Grants.

Postsecondary Programs Serving Secondary Students

All courses for secondary school students paid for by Perkins dollars must offer students transcripted academic credit that is transferrable to other universities. Courses that offer articulated credit (that is, credit which is only accepted at the issuing postsecondary institution) are not eligible for Perkins funds. This policy ensures that high school students receive college credits that provide value, regardless of which postsecondary institution students’ end up attending.

A portion of funding each year must be dedicated to ensuring coordinated communication strategies for helping schools, students, and families learn about postsecondary CTE opportunities. RIDE encourages postsecondary programs to dedicate a portion of funding each year to aligning academic content requirements between state-approved high school CTE programs and corresponding postsecondary programs, particularly those in Priority Sectors.

Funded programs may offer courses via dual enrollment or concurrent enrollment. Dual enrollment courses are courses offered at the postsecondary institution. Concurrent enrollment courses are courses offered at the high school by an instructor approved by the postsecondary institution.

To be eligible for Perkins funds, concurrent enrollment courses must meet the same standards of quality and rigor as dual enrollment courses. Specifically, concurrent enrollment courses must offer:

•          The same college course (delivery, assessment, and content) for high school students as offered on the college campus.

•          College-provided teacher mentorship/ professional development for course.

•          College-led course quality reviews

Postsecondary Programs Serving Postsecondary Students

College-level programming must lead to students earning industry-recognized credentials of value. Representatives from the PrepareRI agencies—including the Rhode Island Governor’s Office, RIDE, Department of Labor and Training (DLT), Governor’s Workforce Board (GWB), Office of the Postsecondary Commissioner (OPC), Rhode Island Commerce, and the CTE Board are working to more precisely define industry-recognized “credentials of value” for postsecondary students.

•          Programs must offer transcripted, not articulated, credit to students. (See the previous section for a discussion of articulated versus transcripted credit.)

•          Programs must embed work-based learning opportunities and employability skills training, aligned to relevant state standards.

•          Programs must engage students in some form of career counseling.

Applications and Reporting for Formula Funds

CCRI is the only postsecondary institution in Rhode Island that will receive formula funds. RIDE will release an annual application for Perkins funding for these funds. This application may include a narrative application, required evidence, and budget. The focus of the application is how the postsecondary institution is using the funds to prepare students for career success. RIDE and the CTE Board are focused on how to maximize the return on investment (ROI) of Perkins dollars on student outcomes. If the postsecondary institution needs to modify the budget that received RIDE approval in the original funding application, it must notify RIDE and the CTE Board. Major modifications require prior approval from RIDE.

The postsecondary institution will be required to submit data and a year-end report to RIDE and the CTE Board every year. If these annual reports indicate the program is not meeting expectations for student outcomes, RIDE and the CTE Board reserve the right to work with the postsecondary institution to improve those outcomes. Student outcomes are tied to transcripted postsecondary credit, industry recognized credential(s), work-based learning opportunity, employability skills, and a demonstrated connection to secondary CTE programs. This may include modifying the terms of approval from the original funding application.

Postsecondary Partnership Grants

Postsecondary Partnership Grants are competitive grants that may be offered to any postsecondary institution in Rhode Island. These grants are offered through the Reserve Fund, and awards are granted based on evidence of providing students with valuable postsecondary/industry credentials, academic skills, and industry-specific teacher professional development. See page 64 for more information.

***II.C.1.c. Describe the criteria and process for how the eligible agency will approve eligible recipients for funds under this Act, including how each eligible recipient will ensure the local needs assessment under section 134 takes into consideration local economic and education needs, including, where appropriate, in-demand industry sectors and occupations.  (Section 122(d)(5) of Perkins V)***

Structure of the Comprehensive Local Needs Assessment

All recipients must demonstrate strong local industry, student interest, and community support to be eligible for Perkins funds. The Comprehensive Local Needs Assessment is the mechanism programs will use to demonstrate this demand.

Program application will require recipients to complete a Comprehensive Local Needs Assessment using a state provided template which requires the eligible recipient to consider local economic and education needs, including, where appropriate, Priority Sectors, as defined by Rhode Island Commerce (see Section II.B.2.c.iii on page 40 for more information) and applied to the CTE Board Standards by the CTE Board and RIDE. Grants will not be distributed to applicants who do not demonstrate completion of the Comprehensive Local Needs Assessment with fidelity.

The Comprehensive Local Needs Assessment asks specific questions around the size, scope and quality of each program. The tool considers:

•          Labor Market Information: the skills and areas where students will identify career opportunities that allow for career progression and life success in growth industries

•          Program Quality: the alignment and ability of programs to deliver, support, and meet the academic, technical, and employability skills necessary for students to enter the world of work and be successful in future careers in growing fields

•          Educator Certification and Professional Development: Support the development of a pipeline of individuals able to meet the requirements of CTE Programs and address related instructor certification requirements.  Further, develop the tools and related experiences educators require to prepare students for those opportunities

•          Student Access to Programs: ensuring all students have access to quality programs that will prepare them for these opportunities

•          Student Performance: whether students in the program are achieving the necessary skills and indicators of readiness for those opportunities

Timing and Frequency of Local Needs Assessments

During the FY20 planning year, all Perkins recipients will be required to fill out a Comprehensive Local Needs Assessment explaining how all of their CTE programs provide students with the skills they need to succeed in the Rhode Island economy. If student performance data indicates that programs are not meeting the agreed upon expectations of the CTE Program Standards, then RIDE may request that the Comprehensive Local Needs Assessment be updated annually.

Secondary

After the FY20 planning year, LEAs must complete an updated Comprehensive Local Needs Assessment on a biannual basis. The Comprehensive Local Needs Assessment will be a required part of the renewal process for CTE programs.  Programs may receive up to a five-year approval.  RIDE reserves the right to request additional information, as determined by student performance data and CTE program outcomes. Comprehensive Local Needs Assessments will be included as part of the application process for the approval of new CTE programs.

Postsecondary

Postsecondary institutions receiving formula grants must complete a Comprehensive Local Needs Assessment in FY20, and biannually thereafter. Under this plan, CCRI is the only Rhode Island postsecondary institution receiving formula grants.

Postsecondary institutions receiving competitive Postsecondary Partnership Grants through Perkins Reserve Funds shall be required to complete a Comprehensive Local Needs Assessment as part of the original grant application and any subsequent renewals of the grant.

***II.C.2.a. Describe how funds received by the eligible agency through the allotment made under section 111 of the Act will be distributed among career and technical education at the secondary level, or career and technical education at the postsecondary and adult level, or both, including how such distribution will most effectively provide students with the skills needed to succeed in the workplace.***

RIDE will allocate 5% of Perkins funds for State Administration, 10% for State Leadership, and 85% for Local Formula Distribution.

Increasing Reserve Fund to 15%

Of the 85% to be distributed through Local Formula Distribution, RIDE will increase the percentage allocated to the Reserve Fund from 10% in FY21 to 15% in FY23. The Reserve will be 10% in FY21, 12.5% in FY22, and 15% in FY23 onwards.

The Reserve Fund will be allocated as follows: 75% for secondary programs and 25% for postsecondary programs. The secondary Reserve Funds will be used for Equity Grants, Career Exploration Grants, and CTE Teacher Grants. The postsecondary Reserve Funds will be used for Postsecondary Partnership Grants. RIDE will award all these Reserve Fund grants on a competitive basis, and all grantees will be required to report on outcomes to RIDE. For the Career Exploration, Equity, and Postsecondary Partnership Grants, grantees must report on student outcomes and fulfillment of grant requirements. For the Teacher Grants, grantees must report on teacher outcomes and fulfillment of grant requirements. These grant programs replace the previous use of Reserve Funds grants, namely the Vocational Training for Adults (VTA) and Secondary to Postsecondary Articulation for Technology Education (SPATE) programs.

Allocation of Perkins Funds

            FY21    FY22    FY23    FY24

State Administration   5%       5%       5%       5%

State Leadership         10%     10%     10%     10%

Local Formula Distribution     85%

Reserve: 10%

    Secondary: 75%

    Postsec.: 25%

Formula: 90%

    Secondary: 90%

    Postsec.: 10%          85%

Reserve: 12.5%

    Secondary: 75%

    Postsec.: 25%

Formula: 87.5%

    Secondary: 90%

    Postsec.: 10%          85%

Reserve: 15%

    Secondary: 75%

    Postsec.: 25%

Formula: 85%

    Secondary: 90%

    Postsec.: 10%          85%

Reserve: 15%

    Secondary: 75%

    Postsec.: 25%

Formula: 85%

    Secondary: 90%

    Postsec.: 10%

See Section IV on page 86 for a more detailed budget.

Equity Grants

LEAs may apply for these funds to address access, participation, or performance gaps of specific student subgroups in CTE programs in Priority Sectors. Eligible subgroups include, but are not limited to, special populations and groups such as those defined by: gender, race, socioeconomic status, English Language Learner status, disability status, and others. To be eligible, applicants must identify the gap, complete a root cause analysis, and propose programmatic and/or policy solutions to address the identified root cause. They are funded through the 75% of the Reserve Fund allocated to secondary programs. These funds may be used for approved programs, or for new programs that have not yet been approval; if used for new programs, the grantee must apply for program preapproval.

Career Exploration Grants

LEAs may apply for these funds to help middle school students explore and build awareness of possible careers—particularly those in Priority Sectors—and high school CTE programs where they could continue pursuing this career progression. All applicants must have an industry partner, connect programming to students’ Individual Learning Plan (ILP), and integrate career exploration curriculum into core content classes and report student outcomes. They are funded through the 75% of the Reserve Fund allocated to secondary schools.

CTE Teacher Grants

LEAs may apply for these funds to pay for the costs associated with providing professional development for CTE teachers and for reimbursing teachers for the cost of certification to teach in CTE programs. These grants are funded through the 75% of the Reserve Fund allocated to secondary schools.

Postsecondary Partnership Grants

Postsecondary institutions in Rhode Island may apply for these funds to support programs that allow high school students to earn transcripted, portable credits that prepare students for careers, and provide teachers industry-specific professional development. They are funded through the 25% of the Reserve Fund allocated to postsecondary programs.

Career and Technical Student Organizations (CTSOs)

Career and Technical Student Organizations (CTSOs) are currently funded through 15% of State Leadership Funds. RIDE will maintain current funding levels within State Leadership funds for a CTSO Allocation.

CTSOs are effective at improving the career readiness of students, and RIDE believes they are particularly impactful when directly managed by schools and aligned to their programs. Therefore, RIDE will provide the CTSO Allocation directly to LEAs for their decision-making, rather than having RIDE manage the relationships. These funds will be distributed to LEAs using the same formula used for the Local Formula Distribution. The use of these funds will follow the same rules as Local Formula Distribution dollars. (See page 65 for more information on those rules.) LEAs may decide to spend as much or as little of their CTSO Allocation and their formula allocation on CTSOs as they think will maximally benefit their students.

Leadership and Administrative Funds

RIDE will use Leadership and Administrative funds for funding of technical assistance, support of incarcerated youth and adults in earning industry recognized credentials and skills, and increasing access and participation in CTE programs, specifically among special populations (as defined by United States Department of Education), and staffing and administrative costs at RIDE.

***II.C.2.b. Describe how funds received by the eligible agency through the allotment made under section 111 of the Act will be distributed among any consortia that may be formed among secondary schools and eligible institutions, and how funds will be distributed among the members of the consortia, including the rationale for such distribution and how it will most effectively provide students with the skills needed to succeed in the workplace.  (Section 122(d)(8) of Perkins V)***

Previously, RIDE required LEAs to join regional consortia, and RIDE distributed all Perkins funds to the fiscal agent of the regional consortia. RIDE is ending that policy under Perkins V. Starting in FY21, LEAs may decide, at their discretion, to join consortia or to receive funds from RIDE directly. RIDE believes schools and district are best able to make these decisions, and therefore RIDE will empower LEAs to make their own decisions about how to receive their Perkins funding.

In order to submit an application for Perkins fund for FY21 onwards, LEAs must submit notice to RIDE about whether they would like to receive the funds generated by their LEA directly, or whether they should be allocated to another fiscal agent as part of a consortium. LEAs may form consortia of any type allowed under federal and state law, regional or otherwise.

Any funds distributed through a consortium will be in accordance with the terms of the consortia’s agreed upon practices and procedures that best support the consortium’s purpose for serving students. Consortiums must demonstrate all members have considered how to most effectively provide students with the skills needed to succeed in the workplace, and that the proposed distribution model is in service to that goal. RIDE may develop common business rules for all consortia to ensure transparency around funding decisions for LEAs.

The formula for distributing grants among LEAs will not change for FY21 onwards. These grants will follow the methodology used by the United States Department of Education for district level allocations.  These are determined based on US Census data with 30% of funding based on overall population and 70% of funding based on poverty in the population. Census data adjusted to account for schools without a corresponding geographic region, using the same method RIDE follows for the distribution of other federal funds, such as Title I.

***II.C.3. Provide the specific dollar allocations made available by the eligible agency for career and technical education programs and programs of study under section 131(a)-(e) of the Act and describe how these allocations are distributed to local educational agencies, areas career and technical education schools and educational service agencies within the State.  (Section 131(g) of Perkins V)***

Based on the FY20 federal allocation, RIDE expects to allocate $4,301,174 for secondary programs using Census data in accordance with the formula in Section 131(a). As noted above, RIDE may distribute these funds directly to LEAs or to consortia, depending on the LEA’s stated preference.

***II.C.4. Provide the specific dollar allocations made available by the eligible agency for career and technical education programs and programs of study under section 132(a) of the Act and describe how these allocations are distributed to eligible institutions and consortia of eligible institutions within the State.***

 Based on FY20 federal allocation, RIDE expects to allocate $477,908 for postsecondary programs.  The entire amount will be distributed to the Community College of Rhode Island, as it is the only institution that meets the criteria of being public and offering a two-year technical program of study.

***II.C.5. Describe how the eligible agency will adjust the data used to make the allocations to reflect any changes in school district boundaries that may have occurred since the population and/or enrollment data was collected, and include local education agencies without geographical boundaries, such as charter schools and secondary schools funded by the Bureau of Indian Education.  (Section 131(a)(3) of Perkins V)***

Because the Census data used for allocating funds is based on municipalities and does not include charter schools or state schools, RIDE adjusts the data to shift students from their district of residence to the appropriate charter or state school based on the most recent enrollment figures available. For a poverty measure, RIDE assumes that the number of students at the charter or state school in poverty reflect the same proportion as the district they came from. This method is the same one that is also used for other Rhode Island education funding based on poverty (for example, Title I).

There are no charter schools or schools funded by the Bureau of Indian Affairs in Rhode Island.

***II.C.6.If the eligible agency will submit an application for a waiver to the secondary allocation formula described in section 131(a)—***

***a) include a proposal for such an alternative formula; and***

***b) describe how the waiver demonstrates that a proposed alternative formula more effectively targets funds on the basis of poverty (as defined by the Office of Management and Budget and revised annually in accordance with section 673(2) of the Community Services Block Grant Act (42 U.S.C. 9902(2)) to local educational agencies with the State.  (Section 131(b) of Perkins V). Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).***

RIDE will not submit an application for a waiver to the secondary allocation formula.

***I.C.7. If the eligible agency will submit an application for a waiver to the postsecondary allocation formula described in section 132(a)—***

***a) include a proposal for such an alternative formula; and***

***b) describe how the formula does not result in a distribution of funds to the eligible institutions or consortia with the State that have the highest numbers of economically disadvantaged individuals and that an alternative formula will result in such a distribution.  (Section 132(b) of Perkins V). Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV)***

 RIDE will not submit an application for a waiver to the postsecondary allocation formula.

***II.C.8. Provide the State’s fiscal effort per student, or aggregate expenditures for the State, that will establish the baseline for the Secretary’s annual determination on whether the State has maintained its fiscal effort, and indicate whether the baseline is a continuing level or new level.  If the baseline is new, please provide the fiscal effort per student, or aggregate expenditures for the State, for the preceding fiscal year.  (Section 211(b)(1)(D) of Perkins V)***

  Rhode Island’s aggregate annual expenditures for CTE is $27,585,825, based on FY19. This not a new baseline and is not a waiver request.

#### d. Accountability for Results

* 1. Identify and include at least one (1) of the following indicators of career and technical education program quality—
  + a. The percentage of CTE concentrators (see Text Box 6 for the statutory definition of a CTE concentrator under section 3(12) of Perkins V) graduating from high school having attained a recognized postsecondary credential;
  + b. The percentage of CTE concentrators graduating high school having attained postsecondary credits in relevant career and technical education programs and programs of study earned through a dual or concurrent enrollment program or another credit transfer agreement; and/or
  + c. The percentage of CTE concentrators graduating from high school having participated in work-based learning. (Section 113(b)(2)(A)(iv)(I) of Perkins V)

Include any other measure(s) of student success in career and technical education that are statewide, valid, and reliable, and comparable across the State. (Section 113(b)(2)(A)(iv)(II) of Perkins V) Please note that inclusion of “other” program quality measure(s) is optional for States.

Provide the eligible agency’s measurement definition with a numerator and denominator for each of the quality indicator(s) the eligible agency selects to use.

* 2. Provide on the form in Section V.B, for each year covered by the State plan beginning in FY 2020, State determined performance levels or each of the secondary and postsecondary core indicators, with the levels of performance being the same for all CTE concentrators in the State. (Section 113(b)(3)(A)(i)(I) of Perkins V)

| Text Box 6: Statutory Definition of CTE Concentrator |
| --- |
| The term ‘CTE concentrator’ means—   * (A) At the secondary school level, a student served by an eligible recipient who has completed at least 2 courses\* in a single career and technical education program or program of study; and * (B) At the postsecondary level, a student enrolled in an eligible recipient who has—   + (i) Earned at least 12 credits within a career and technical education program or program of study; or   + (ii) Completed such a program if the program encompasses fewer than 12 credits or the equivalent in total. (Section 3(12) of Perkins V)   \* This means that once a student completes 2 courses in a single CTE program or program of study, they are counted as a CTE concentrator.  (Section 3(12) of Perkins V) |

* 3. Describe the procedure the eligible agency adopted for determining State determined levels of performance described in section 113 of Perkins V, which at a minimum shall include—
  + a. A description of the process for public comment under section 113(b)(3)(B) of Perkins V as part of the development of the State determined levels of performance (see Text Box 7 for the statutory requirements for consultation on State determined performance levels under section 113(b)(3)(B) of Perkins V);
  + b. An explanation for the State determined levels of performance that meet each of the statutory requirements in Text Box 8; and
  + c. A description of how the State determined levels of performance set by the eligible agency align with the levels, goals and objectives other Federal and State laws, (Section 122(d)(10) of Perkins V).

As part of the procedures for determining State determined levels of performance, describe the process that will be used to establish a baseline for those levels.

* 4. Provide a written response to the comments regarding State determined performance levels received during the public comment period pursuant to section 113(b)(3)(B) of Perkins V. (Section 113(b)(3)(B)(iii) of Perkins V).

As part of the written response, include a description of any the changes made to the State determined performance levels as a result of stakeholder feedback.

* 5. Describe how the eligible agency will address disparities or gaps in performance as described in section 113(b)(3)(C)(ii)(II) of Perkins V in each of the plan years, and if no meaningful progress has been achieved prior to the third program year, a description of the additional actions the eligible agency will take to eliminate these disparities or gaps. (Section 122(d)(11) of Perkins V)

As part of the written response, and pursuant to the Report of the Senate Committee on Health, Education, Labor, and Pensions (HELP),2 the eligible agency could indicate that it will analyze data on the core indicators of performance to identify gaps in performance, explain how they will use evidence-based research to develop a plan to provide support and technical assistance to eligible recipients to address and close such gaps, and how they will implement this plan. The eligible agency is not required to submit a new State plan prior to the third program year in order to address this requirement.

| Text Box 7: Statutory Requirements for Consultation on State Determined Performance Levels |
| --- |
| * (B) PUBLIC COMMENT.—   + (i) IN GENERAL.—Each eligible agency shall develop the levels of performance under subparagraph (A) in consultation with the stakeholders identified in section 122(c)(1)(A).   + (ii) WRITTEN COMMENTS.—Not less than 60 days prior to submission of the State plan, the eligible agency shall provide such stakeholders with the opportunity to provide written comments to the eligible agency, which shall be included in the State plan, regarding how the levels of performance described under subparagraph (A)—     - (I) Meet the requirements of the law;     - (II) Support the improvement of performance of all CTE concentrators, including subgroups of students, as described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965, and special populations, as described in section 3(48); and     - (III) Support the needs of the local education and business community.   + (iii) ELIGIBLE AGENCY RESPONSE.—Each eligible agency shall provide, in the State plan, a written response to the comments provided by stakeholders under clause (ii).   (Section 113(b)(3)(B) of Perkins V) |

[2] See page 11 of Committee Report at [https://www.congress.gov/115/crpt/srpt434/CRPT-115srpt434.pdf.](https://www.congress.gov/115/crpt/srpt434/CRPT-115srpt434.pdf)

**II.D. Accountability for Results**

***II.D.1. Identify and include at least one (1) of the following indicators of career and technical education program quality—***

***a) the percentage of CTE concentrators (see Text Box 2 on the following page) graduating from high school having attained a recognized postsecondary credential;***

***b) the percentage of CTE concentrators graduating high school having attained postsecondary credits in relevant career and technical education programs and programs of study earned through a dual or concurrent enrollment program or another credit transfer agreement; and/or***

***c) the percentage of CTE concentrators graduating from high school having participated in work-based learning.  (Section 113(b)(2)(A)(iv)(I) of Perkins V)***

***Provide the eligible agency’s measurement definition with a numerator and denominator for each of the quality indicator(s) the eligible agency selects to use.***

For Perkins accountability purposes, Rhode Island will adopt work-based learning (option C) as a secondary-level program indicator. Work-based learning (WBL) is a requirement of all students in CTE programs.

RIDE will continue to support and expect all students in programs to earn industry-recognized credentials and/or related college credit. Under the CTE Board Standards, all CTE programs must culminate in industry credentials and/or college credit. Since the culminating credential is college credit for some career fields and industry credentials for other career fields, RIDE would not be able to hold all programs accountable to a statewide target related only to college credit or only to credentials. However, programs in all career fields are required to meet any CTE Board Standards and the GWB work-based learning guidance, so that metric is more appropriate for RIDE’s program quality metric.

The GWB created a guidance document for work-based learning that RIDE adopted as the minimum requirement for all work-based learning CTE programs. The GWB defines five types of work-based learning: internships, apprenticeships, service learning, industry-projects, and school-based enterprises. See Section II.B.2 on page 43 for a more information on the GWB work-based learning guidance.

The CTE Board is currently in the process of developing career field-specific work-based learning standards. These standards will be aligned to the GWB guidance, but may be more rigorous and specific. Once those standards are approved by the CTE Board and adopted by RIDE, RIDE will adjust this metric to align to those revised work-based learning standards.

5S3

Program Quality: Work-Based Learning

Numerator:     Number of program concentrators in a graduating class completing high-quality work-based learning, as defined by the CTE Board Standards and the GWB Guidance

Denominator: Number of program concentrators in a graduating class

***Include any other measure of student success in career and technical education that is statewide, valid, and reliable, and comparable across the State.  (Section 113(b)(2)(A)(iv)(II) of Perkins IV)***

***The following are the list of credentials that count toward the Postsecondary Success***

***II.D.2. Provide on the form in Section V.B, for each year covered by the State plan beginning in FY 2020, State determined levels of performance for each of the secondary and postsecondary core indicators, with the levels of performance being the same for all CTE concentrators in the State.   (Section 113(b)(3)(A)(i)(I) of Perkins V)***

  See Section V.

***II.D.3.a Describe the procedure the eligible agency adopted for determining State determined levels of performance described in section 113 of the Act, which at a minimum shall include a description of the process for public comment under section 113(b)(3)(B) of Perkins V as part of the development of the State determined levels of performance under that section as provided in the text box on the following page;***

RIDE has aligned state-determined level of performance for Perkins with previously-established state goals whenever possible. For metrics where there were not previously-established goals and targets, RIDE considered historic data to determine target levels of performance.

The performance levels, alongside the state plan, were open to public comment from February 1, 2020 through March 2, 2020. RIDE made intensive efforts to engage stakeholders from the beginning of the plan development via stakeholder feedback sessions, surveys, summary documents, public presentations to the CTE Board, and a public comment period to promote accurate communication about changes in the plan.

***II.D.3.b Describe the procedure the eligible agency adopted for determining State determined levels of performance described in section 113 of the Act, which at a minimum shall include an explanation for the State determined levels of performance; As part of the procedures for determining State determined levels of performance, describe the process that will be used to establish a baseline for those levels.***

Secondary Measures

**1S1**

**Secondary**: Concentrator Graduation rate

**Description:**  The percentage of CTE concentrators who graduate high school, as measured by the four-year adjusted cohort graduation rate (defined in section 8101 of the Elementary and Secondary Education Act of 1965).  Under the ESEA, Rhode Island is required to calculate four-year adjusted cohort graduation rate (ACGR).

**Numerator:** The four-year ACGR is the number of students who graduate from high school within four years with a regular high school diploma

**Denominator:** The number of CTE concentrators in the graduating class

“CTE concentrators” at a secondary level is defined as students who complete the second course in a state-approved CTE course sequence.

The “graduating class” cohort is defined as the number of students who enter grade 9 for the first time adjusted by adding into the cohort any student who transfers in later during grade 9 or during the next three years and subtracting any student from the cohort who transfers out.

**Baseline:**84%

**Target:** 95% (6-year graduation rate for all students by 2025 – ESSA)

**1S2**

**Secondary:** Extended Graduation rate

**Description:**The percentage of CTE concentrators who graduate high school, as measured by the SIX year cohort graduation rate (defined in section 8101 of the Elementary and Secondary Education Act of 1965).

**Numerator:**  The number of CTE concentrators who graduate high school within six years with a regular high school diploma.

**Denominator:**The number of CTE concentrators in the six year adjusted cohort (following the federal ACGR definition: the number of students who enter grade 9 for the first time in the designated school year, adjusted by adding into the cohort any student who transfers into the school during the next five school years and subtracting any student from the cohort who transfers out).

**Baseline**: 87.26%

**Target:** 95% (6-year graduation rate for all students by 2025 – ESSA)

**2S1**

**Secondary:** Academic Proficiency in Reading/Language Arts

**Description:**  “CTE concentrator proficiency in the challenging State academic standards adopted by the State under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments in reading/language arts as described in section 1111(b)(2) of such Act.”

Proficiency is measured for high school students through the 11th grade SAT. Proficiency is defined as meeting the College Board’s College Ready benchmark.

**Numerator:**

Number of concentrators in graduating class with an SAT score on the ELA section above the College Ready benchmark

**Denominator:**

Number of concentrators in graduating class

**Baseline:**38%

**Target:**69% (ESSA target)

**2S2**

**Secondary**: Academic Proficiency in Mathematics

**Description:**“CTE concentrator proficiency in the challenging State academic standards adopted by the State under section1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments in reading/language arts as described in section 1111(b)(2) of such Act.”

Proficiency is measured for high school students through the Mathematics section of the 11th grade SAT. Proficiency is defined as meeting the College Board’s College Ready benchmark.

**Numerator**: Number of concentrators in graduating class with an SAT score on the Mathematics section above the College Ready benchmark

**Denominator:**Number of concentrators in graduating class

**Baseline:** 31%

**Target:** 68% (ESSA target)

**2S3**

**Secondary**: Academic Proficiency in Science

**Description:**“CTE concentrator proficiency in the challenging State academic standards adopted by the State under section1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments in reading/language arts as described in section 1111(b)(2) of such Act.”

Rhode Island is in the process of developing a statewide science proficiency assessment. That exam has not yet been released statewide.

**Numerator:**Number of concentrators in graduating class with scores on the Rhode Island science assessment above the proficiency threshold.

**Denominator:**Number of concentrators in graduating class

**Baseline:** N/A (exam not yet released)

**Target:**N/A (targets for the science exam will be developed in a future ESSA state plan)

**3S1**

**Secondary**: Concentrator Postsecondary Enrollment

**Description:**“The percentage of CTE concentrators who, in the second quarter after exiting from secondary education, are in postsecondary education or advanced training, military service or a service program that receives assistance under title I of the National and Community Service Act of 1990 (42 U.S.C. 12511 et seq.), are volunteers as described in section 5(a) of the Peace Corps Act (22 U.S.C. 2504(a)), or are employed.”

Rhode Island does not currently collect data on students who are in advanced training, military service, or eligible service programs. RIDE is exploring mechanisms to collect this data in future years.

**Numerator:**Number of concentrators who are in postsecondary education

**Denominator:** Number of concentrators in graduating class

**Baseline:** 63%

**Target:** 2 percentage points improvement each year

**4S1**

**Nontraditional Program Concentration**

**Description:** The percentage of CTE concentrators in career and technical education programs and programs of study that lead to non-traditional fields.

\* Nontraditional fields are defined as those in which a subgroup is significantly underrepresented. For gender, “significantly underrepresented” is defined as 25% or less of a gender in a particular field. RIDE will develop numerical benchmarks for other subgroups.

**Numerator:**CTE concentrators in graduating class in non-traditional fields

**Denominator:**CTE concentrators in graduating class

**Baseline:**5%

**Target:**2 percentage point improvement each year

**5S3**

**Secondary: Work-Based Learning**

**Description:** The percentage of CTE concentrators graduating from high school having participated in work-based learning that meets the standards from the Governor’s Workforce Board Guidance and any relevant CTE Board Standards.

See Section D.1 on page 71 for more information.

**Numerator:** Number of graduating concentrators having completed qualifying work-based learning

**Denominator**: Number of graduating concentrators

**Baseline:**Baseline will be set in FY20.

**Target:**2 percent improvement per year

**Postsecondary Measures**

**1P1**

**Postsecondary: Post-program placement**

**Description:** “The percentage of CTE concentrators who, during the second quarter after program completion, remain enrolled in postsecondary education, are in advanced training, military service, or a service program that receives assistance under title I of the National and Community Service Act of 1990 (42 U.S.C. 12511 et seq.), are volunteers as described in section 5(a) of the Peace Corps Act (22 U.S.C. 2504(a)), or are placed or retained in employment.”

Rhode Island does not currently collect data on students who are in advanced training, military service, or eligible service programs.

**Numerator:**CTE postsecondary concentrators who remained enrolled in postsecondary education

**Denominator:**CTE postsecondary concentrators

“CTE postsecondary concentrators” are defined as a student enrolled in an eligible Perkins-funded postsecondary program who has earned at least 12 credits within a CTE program, or completed such a program if the program encompasses fewer than 12 credits or the equivalent in total.

**Baseline:** Baseline will be set in FY20.

**Target:** 2 percentage point improvement each year

**2P1**

**Postsecondary: Earned Recognized Postsecondary Credential**

**Description**:  The percentage of CTE concentrators who receive a recognized postsecondary credential during participation in or within one year of program completion.

**Numerator:**CTE postsecondary concentrators in earning credential within one year

**Denominator:**CTE postsecondary concentrators who graduated one year earlier

**Baseline:**Baseline will be set in FY20.

**Target:**2.5 percentage point improvement each year

**3P1**

**Postsecondary: Concentrator in programs leading to nontraditional fields**

**Description:**The percentage of CTE concentrators in career and technical education programs and programs of study that lead to nontraditional fields.

**Numerator:**CTE postsecondary concentrators in nontraditional fields

**Denominator**: CTE postsecondary concentrators

**Baseline:** Baseline will be set in FY20.

**Target:** 2 percentage point improvement each year

***II.D.3.c. a description of how the state determined levels of performance set by the eligible agency align with the levels, goals and objectives other Federal and State laws, (Section 122(d)(10) of Perkins V).***

 Under the Every Student Succeeds Act (ESSA), RIDE updated its School and District Report Cards. These report cards provide the foundation for RIDE’s system of school accountability and include a broader range of performance metrics. RIDE sees this as an opportunity to anchor its accountability work in the levers that RIDE knows make a difference, including not only traditional indicators—like test scores—but also leading indicators like attendance and suspension rates, which give a more holistic view of school climate, culture, and performance.

These Report Cards are designed to provide data in an accessible, transparent way for educators, policymakers, and—most importantly—students and families. RIDE wants all stakeholders to feel empowered to not only understand their school community, but also to make informed decisions for their families.

Wherever possible, RIDE aligned these performance goals to the goals set in ESSA and measured by these Report Cards. Other goals are aligned to the goals and policies of the CTE Board, which was created under Rhode Island General Law Chapter 16-45.

More specifically:

•          The student graduation rates (1S1 and 1S2) are aligned to the graduation rate goals established in Rhode Island’s ESSA plan.

•          The indicators of academic proficiency in Reading/Language Arts (2S1), Mathematics (2S2) and Science (2S3), are aligned to the academic goals established in Rhode Island’s ESSA plan.

•          The work-based learning indicator (5S3) is aligned to the policies of the Governor’s Workforce Board and the CTE Board.

•          The postsecondary Earned Recognized Postsecondary Credential (2P1) is aligned to the policies of the Department of Labor, Governor’s Workforce Board, Office of the Postsecondary Commissioner, and CTE Board.

***II.D.4. Provide a written response to the comments regarding State determined performance levels received during the public comment period pursuant to section 113(b)(3)(B) of Perkins V. (Section 113(b)(3)(B)(iii) of Perkins V). As part of the written response, include a description of any the changes made to the State determined performance levels as a result of stakeholder feedback.***

RIDE did not receive any feedback during public comment related to state-determined levels of performance. Most of the feedback focused on how to better serve student subgroups, so RIDE added more details about how it defines student groups for the goals and metrics outlined in this plan.

***II.D.5. Describe how the eligible agency will address disparities or gaps in performance as described in section 113(b)(3)(C)(ii)(II) of Perkins V in each of the plan years, and if no meaningful progress has been achieved prior to the third program year, a description of the additional actions the eligible agency will take to eliminate these disparities or gaps.  (Section 122(d)(11) of Perkins V)***

Through the previously-mentioned annual CTE program accountability reporting and Perkins accountability reporting, RIDE will analyze data on program concentrators and the core indicators of performance to identify gaps in participation and performance. Where local gaps exist, RIDE will work with schools to determine root cause and apply research-based practices to close gaps. Where state level gaps are found, RIDE will identify state-wide research-based practices for implementation and conduct technical assistance to eligible recipients to address and close such gaps.

These implementation measures may be supported in part or whole through the previously described Equity Grant program funded through the Perkins Reserve Fund.

V. State Determined Levels of Performance (SDLP)

**State Determined Performance Levels (SDPL) Form**

State Name: Rhode Island

|  |  | **FY 2024** | **FY 2025** |
| --- | --- | --- | --- |
| **Secondary Indicators** |  |  |  |
| 1S1: Four-Year Graduation Rate | 84%[[1]](https://wioaplans.ed.gov/node/423516#_ftn1) | 92% | 93% |
| 1S2: Extended Graduation Rate | 87.2%[[2]](https://wioaplans.ed.gov/node/423516#_ftn2) | 91% | 92% |
| 2S1: Academic Proficiency in Reading/Language Arts | 38%[[3]](https://wioaplans.ed.gov/node/423516#_ftn3) | 62% | 67% |
| 2S2: Academic Proficiency in Mathematics | 31%[[4]](https://wioaplans.ed.gov/node/423516#_ftn4) | 61% | 66% |
| 2S3: Academic Proficiency in Science | 0%[[5]](https://wioaplans.ed.gov/node/423516#_ftn5)  (Data not yet available) | 10% | 12% |
| 3S1: Post-Program Placement | 63%[[6]](https://wioaplans.ed.gov/node/423516#_ftn6) | 72% | 72% |
| 4S1: Non-traditional Program Concentration | 5%[[7]](https://wioaplans.ed.gov/node/423516#_ftn7) | 15% | 15% |
| 5S1: Program Quality –   Attained Recognized Postsecondary Credential | *N/A* | *N/A* | *N/A* |
| 5S2: Program Quality –   Attained Postsecondary Credits | *N/A* | *N/A* | *N/A* |
| 5S3: Program Quality –    Participated in Work-Based Learning | 0%[[8]](https://wioaplans.ed.gov/node/423516#_ftn8)  (Data not yet available) | 10% | 12% |
| **Postsecondary Indicators** |  |  |  |
| 1P1: Post-Program Placement | 0%[[9]](https://wioaplans.ed.gov/node/423516#_ftn9)  (Data not yet available) | 8% | 8% |
| 2P1: Earned Recognized Postsecondary Credential | 0%[[10]](https://wioaplans.ed.gov/node/423516#_ftn10)  (Data not yet available) | 10% | 12% |
| 3P1: Non-traditional Program Concentration | 0%[[11]](https://wioaplans.ed.gov/node/423516#_ftn11)     (Data not yet available) | 10% | 12% |

### Temporary Assistance for Needy Families (TANF)

States that include TANF in the Combined State Plan must outline how the State will meet the requirements of section 402 of the Social Security Act including how it will:

(OMB Control Number: 0970-0145)

#### a. Conduct a program designed to serve all political subdivisions in the State (not necessarily in a uniform manner) that provides assistance to needy families with (or expecting) children and provides parents with job preparation, work, and support services to enable them to leave the program, specifically cash assistance, and become self-sufficient (section 402(a)(1)(A)(i) of the Social Security Act)

Plan effective July 1, 2024

The Rhode Island Department of Human Services (DHS) is the state agency responsible for administration of the federal Temporary Assistance for Needy Families (TANF) Block Grant. DHS is also responsible for implementation of the Rhode Island Works Act of 2008. Together, these federal and state programs provide essential services for low-income families throughout the State to assist them in meeting their basic family needs, while at the same time providing parents with a range of supports to help them prepare for and access the job market while achieving stabilization, as identified by the family.

In accord with the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), the State of Rhode Island has developed its TANF State Plan based upon the four major purposes of TANF, which are to:

• Provide assistance to needy families so that children may be cared for in his or her own home or in the home of a relative;

• End dependence of needy parents on government benefits by promoting job preparation, work, and marriage;

• Prevent and reduce the incidence of out of wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; and

• Encourage the formation and maintenance of two-parent families

Rhode Island Works Program

The RI General Assembly revised the state TANF law in June 2008 (RIGL 40-5.2 et seq.). Entitled The Rhode Island Works Program, it was designed to help low-income families toward independence while at the same time improving the State’s efforts to achieve the required TANF Work Participation Rates. Since 2008, the General Assembly has made several adjustments to the law. Recently there have been several revisions, the statutory changes were largely prompted by the ongoing work with the Whole Family Approach to Jobs initiative with Administration for Children and Families. Most notedly, Rhode Island has had several changes to the Rhode Island Works law including expanded the time limit from 24 months to 60 months, increasing the standard of assistance by thirty percent, adding an earning disregard for newly employed recipients, increasing the resource limit, and discounting more earned income so families can retain more cash assistance.

Eligibility for RI Works/TANF Program:

A “family” is defined for the RI Works/TANF cash assistance program as (a) a pregnant woman from and including the seventh month of her pregnancy; and/or (b) a child and the following eligible persons living in the same household as the child: (A) each biological, adoptive or stepparent of the child, or in the absence of a parent, any adult relative who is responsible, in fact, for the care of such child, and (B) the child’s minor siblings, whether of whole or half-blood: provided, however, that the term “family” shall not include any person receiving benefits under title XVI of the Social Security Act, 42 U.S.C. 1381 et seq. A family may be the same as the Assistance Unit.

A low-income family includes a child under the age of 18, or under 19 if a full-time student, and family income is 225% of the federal poverty level or below.

An eligible family must meet age, relationship, citizenship/alienage, residency, and cooperation requirements, as well as remain within the income and resource limits of the program. As long as single parents and two (2) parent families meet income and resource limits of the program and are otherwise eligible, they qualify for cash assistance, child care, supplemental nutrition assistance program, and health care coverage.

Eligibility is limited to families whose available resources reduced by any obligations or debts with respect to such resources, total less than five thousand dollars ($5,000). Eligibility is denied or terminated if the value of non-exempt resources exceeds the five-thousand-dollar limit. With regards to vehicle ownership, the State has chosen to exclude as a resource one (1) vehicle for each adult household member, not to exceed two (2) vehicles per household.

To determine eligibility for cash assistance, the total of a family’s countable earned income, after an earned income disregard of the first $300/month and one half the remainder of earnings, and unearned income is compared with the appropriate assistance payment standard for the unit. The payment standard is equal to the sum of the following:

• For the first person: four hundred twenty-five dollars ($425) or three hundred sixty dollars ($360) for a family residing in subsidized housing;

• For the second person: one hundred fifty-nine dollars ($159) • For the third person: one hundred thirty-seven dollars ($137), and

• For each additional person: one hundred and four dollars ($104) for each additional person.

If during an emergency the Departments deems it necessary, DHS household will receive a non-recurrent short-term benefit, sometimes referred to as a NRST. This payment structure will not exceed four (4) months. The emergency benefit will be in accordance with 45 CFR §§ 260.31(b); 286.10(b).

Cooperation with the child support enforcement agency is required as a condition of eligibility for cash assistance. To continue to be counted as a family member for the purpose of cash assistance, a child is allowed temporary absences from the home for no more than ninety (90) days per episode, with a second ninety (90) day renewal authorized only through supervisory approval. The program requires minor parents to live with a parent, relative, or in a supervised setting and remain in school, unless otherwise authorized by the Department for specific good cause reasons and the minor resides in an approved supervised supportive living arrangement.

Rhode Island Works Program Time Limit: The Rhode Island Works law (RIGL 40-5.2 et seq.) provides cash assistance a maximum of sixty (60) months.

Time limit begins with the first issuance of cash assistance. An applicant is required to sign an Employment Plan as a condition of eligibility for cash assistance. Some recipients are exempted from immediate work activities, such as parents who are waived under the Domestic Violence Waiver process. Time limit applies to families in which citizen children receive assistance although their non-citizen parents do not.

Exceptions to time limit applies in the instances of: (1) a minor child(ren) living with a single parent who receives SSI benefits, or with two-parents who both receive SSI benefits; and (2) a minor child(ren) living with a legally responsible non-parent caretaker relative who is not in the cash assistance payment.

Hardship Extension to Time Limit: Any individual approaching the time limit is notified that they may request a reassessment to determine whether or not they meet the criteria for an extension to time limit. Additionally, any parent who has met or exceeded the time limit may reapply and be assessed to determine if they meet any of the criteria for an extension beyond the time limit.

A parent who is undocumented, who has received benefits for their citizen child(ren), may request a hardship extension for the child(ren) at the time limit. A parent who does not meet the alienage requirements required for eligibility for cash assistance under federal PRWORA (e.g., those Legal Permanent Resident families in which the parent has been in the United States less than five (5) years), who has received benefits for her/his citizen child(ren), may also request a hardship extension for the child(ren).

A hardship extension may be granted to all otherwise eligible families who meet at least one of the following criteria:

• has a documented significant physical or mental incapacity and can verify/document a pending application for SSI or SSDI and has submitted an application for or is active and making progress in her/his Employment Plan with the Office of Rehabilitation Services (ORS); or

• is caring for a significantly disabled family member who resides in the home and requires full time care; or

• is homeless — meaning a lack of a fixed and regular nighttime residence or a primary nighttime residence, such as a supervised shelter, a halfway house, a temporary residence, a temporary accommodation (e.g., hotel/motel), a residence of another for not more than ninety days, or a place not designed for regular sleeping accommodations (e.g., bus station); or

• is unable to pursue employment because of a current, documented domestic violence situation; or

• is unable to work because of a critical other condition or circumstance, other than citizenship or alienage status.

For TANF program purposes, families extended beyond sixty (60) months of TANF cash assistance under the categories listed above will be included in the federally-funded twenty percent (20%) hardship exceptions.

Public Involvement

Since passage of PRWORA in August 1996 and the implementation of Rhode Island’s own welfare reform legislation in May 1997, RI DHS has maintained a strong and viable partnership with the initial Welfare Reform Implementation Task Force (WRITF). With the enacted Rhode Island Works Program, the WRITF group is now known as the Rhode Island Works Advisory Committee. The membership consists of representatives of state agencies, anti-poverty organizations, and community-based organizations that are committed to assisting the State and the Department in efforts to deliver an effective program for low-income families.

The Rhode Island Works Program Advisory Committee has met bimonthly and receives data reports, reviews and comments on policy and regulations, and offers recommendations to the Director on best practices and effective solutions to challenges and opportunities facing the State of Rhode Island.

Through both the formal public hearing process as well as the ongoing advisory committee meetings, the State of Rhode Island continues its commitment of transparency and openness with regard to its public assistance programs. The Department will continue to work closely with the community to ensure continuous improvement in our progress toward helping families out of poverty.

#### b. Require a parent or caretaker receiving assistance to engage in work (defined by the State) once the State determines the parent or caretaker is ready to engage in work, or once he or she has received 24 months of assistance, whichever is earlier, consistent with the child care exception at 407(e)(2) (section 402(a)(1)(A)(ii) of the Social Security Act)

1. Work Requirements and Participation Requirements under RI Works Program

All parents and caretaker relatives, including those who are acting in loco parentis, if they are included in the cash assistance grant, who request and receive assistance are required to enter into an employment plan and participate, unless temporarily exempt, in DHS-approved work-related activities. Employment plans are required prior to eligibility being granted to recipients, unless the adult recipient is exempted, an SSI recipient, or a non-requesting member of the households, also called child only.  
2. One Parent Family Requirements

Single parents shall participate for a minimum of twenty (20) hours per week for parents whose youngest child in the home is under the age of six (6), and for a minimum of thirty (30) hours per week for parents whose youngest child in the home is six (6) years of age or older, in one or more of the following work activities, as appropriate, in order to help the parent obtain stable full-time living wage employment. For teen parents, the first activity must be secondary education or completion of a GED program, if either certificate has not yet been obtained.

Core Activity Opportunities for One Parent Families:

• Unsubsidized employment;

• Subsidized private sector employment;

• Subsidized public sector employment;

• Work experience. A parent participating in a work experience or community service program for the maximum number of hours per week allowable by the Fair Labor Standards Act (FLSA) will be considered to have met their required twenty (20) core hours if actual participation falls short of the required minimum hours per week. For parents whose youngest child is six (6) or more years old and whose required minimum hours per week are thirty (30), any hours permissible by FLSA that are short of thirty (30) hours must be satisfied in some other TANF work activity;

• On-the-job training;

• Job search and job readiness. Except in the context of supportive service employment plans, job search and job readiness activities are limited to 4 consecutive weeks, or for a total of 6 weeks in a twelve-month period. The DHS shall extend job search and job readiness assistance for up to twelve (12) weeks in a fiscal year if RI has an unemployment rate at least fifty percent (50%) greater than the United States federal unemployment rate, or if the state meets the definition of a needy state under the contingency fund provisions of federal law;

• Community Service;

• Vocational educational training not to exceed twelve (12) months. Participation in a two-year degree program, a vocational certificate program, or a BA degree or advanced degree program may count as vocational educational training. Those participants who are in programs longer than twelve (12) months may use this activity as counting toward participation in a non-core job skills training, if they meet the requirement for a different core activity for sufficient hours. All supervised homework plus up to one hour of unsupervised homework per each hour of class time may count as meeting part of the total hours required for compliance with the RI Works employment plan. However, total homework time cannot exceed the hours required or advised in writing by the educational program;

• Adult education in an intensive work readiness program;

• Child care for an individual participating in a community service program.

Non-core Activity Opportunities for One Parent Families:

• Job skills training directly related to employment, allowable in addition to participation for twenty (20) hours per week in one of the above core activities;

• Education directly related to employment, allowable in addition to participation for twenty (20) hours per week in one of the above core activities;

• Satisfactory attendance at a secondary school or in a course of study leading to a GED. In the case of a parent under the age of 20, such satisfactory attendance in secondary school or in a GED program is countable as a core activity.

Other Required Work Activity Opportunities for One Parent Families:

• Up to ten (10) hours of activities as defined in a DCYF service plan may substitute for meeting an equivalent number of hours toward the twenty (20) hour requirement for parents with a child under age six (6), or for an equivalent number of hours toward the thirty (30) hour requirement for parents whose youngest child is age six (6) or older. The DCYF Social Caseworker II and/or vendor provides the actual number of hours of participation per week required in order for the parent to comply with their service plan. The DHS worker then makes these hours part of the total hours required for compliance with the RI Works employment plan.

Temporary Exemption for Single Parents Work requirements outlined above shall apply to a single parent if, and for so long as, the Department finds that they are:

• Caring for a child below the age of one, provided that a parent may opt for deferral for a maximum of twelve (12) months during a 60 month period of eligibility for cash assistance, but noting that a minor parent without a high school diploma or the equivalent, shall not be exempt for more than twelve (12) weeks from the birth of the child;

• Caring for a child or family member with a significant documented disability who resides in the home and requires full-time care;

• A recipient of SSI or RSDI/SSDI or other disability benefit that has the same standards of disability as defined by the Social Security Administration;

• An RIW applicant or recipient who has completed an application for SSI or SSDI who has been determined by a designated DHS vendor to be likely to become eligible for SSI or SSDI;

• An individual receiving assistance who is a victim of domestic violence;

• An applicant for assistance in her third trimester of pregnancy or a pregnant woman in her third trimester who is a recipient of assistance and who has medical documentation that she cannot work.

• A parent who has a demonstrated an inability to obtain appropriate needed child care for a child younger than age 6.

        • The Department of Human Services establishes the criteria and definitions for determining the "inability to obtain appropriate needed child care" as follows:

          • "Appropriate child care": An individual or program that: (1) has met the requirements established by the Department of Human Services to participate in the CCAP; and (2) entered into a signed and valid agreement with the Department specifying the terms and conditions for enrolling eligible children and receiving payment for CCAP allowable child care expenses.

         • "Reasonable distance": The distance between the child care provider and the individual's residence and/or their job or work activity is not substantially greater than the distance that others living in the same town or city would travel for child care services and then to their work activity.

             •"Unsuitability of informal child care": Care that does not meet the criteria in the definition of appropriate child care would be considered unsuitable.

        •"Affordable child care arrangements": All child care arrangements for Rhode Island Works/TANF recipients are deemed affordable, as these families are not required to pay a co-payment to RI DHS CCAP Rhode Island Approved Providers. In addition, providers are prohibited from charging families the difference between the maximum reimbursement rate and their private pay rate.

        • Parents are informed of the determination verbally during the interview portion of assessment and in writing via a notice.

3. Two Parent Family Requirements

In families consisting of two parents, one parent is required and shall be engaged in work activities as defined below, for at least thirty-five (35) hours per week during the month, not fewer than thirty (30) hours per week of which are attributable to one or more of the following listed work activities. Two parent work requirements shall be defined as follows:

Core Activity Opportunities for Two-Parent Families:

• Unsubsidized employment;

• Subsidized private sector employment;

• Subsidized public sector employment;

• Work experience; • On-the-job training;

• Job search and job readiness. Except in the context of supportive service employment plans, job search and job readiness activities are limited to 4 consecutive weeks, or for a total of 6 weeks in a twelve-month period. The DHS shall extend job search and job readiness assistance for up to twelve (12) weeks in a fiscal year if RI has an unemployment rate at least fifty percent (50%) greater than the United States federal unemployment rate, or if the state meets the definition of a needy state under the contingency fund provisions of federal law;

• Community Service program;

• Vocational educational training not to exceed twelve (12) months;

• The provision of childcare services to a participant individual who is participating in a community service program;

• Adult education in an intensive work readiness program.

Above thirty (30) hours per week, the following three (3) activities may also count for participation: Non-Core Activity Opportunities for Two-Parent Families:

• Job skills training directly related to employment;

• Education directly related to employment; and

• Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence. Satisfactory attendance in secondary school or in a GED program is countable as a core activity in the case of a parent who is married and is under twenty (20) years old.

Other Required Work Activities for Two-Parent Families:

• Up to ten (10) hours of activities as defined in a DCYF service plan may substitute for meeting an equivalent number of hours toward the thirty-five (35) hour requirement. The DCYF Social Caseworker II and/or vendor provides the actual number of hours of participation per week required in order for the parent to comply with their service plan. The DHS worker then makes these hours part of the total hours required for compliance with the RI Works employment plan.

• Housing search, if the family is homeless (or about to become homeless), may be approved for the second parent in a two-parent family, if the first parent is participating in a core activity at least thirty (30) hours per week. This activity may be approved for the first parent, if the second parent receives SSI/RSDI/SSDI. Housing search is classified as job readiness, which is a core activity.

In a two-parent family in which one (1) parent is engaged for at least thirty-five (35) hours per week in the work activities specified above, the other, second, parent may also participate in and have an assessment completed. The second parent must then sign an employment plan.

A family with two parents, whether or not receiving child care, in which one or both parents participate in a work experience or community service program for the maximum number of hours per week allowable by the Fair Labor Standards Act (FLSA) will be considered to have met their required thirty (30) core hours if actual participation falls short of the required minimum hours per week. For families that need additional hours beyond the core activity requirement, these hours must be satisfied in some other TANF work activity. Except in the instance of a work experience or community service program which must meet the requirements of the FLSA as described above, if the family receives child care assistance and an adult in the family is not disabled or caring for a severely disabled child, then the work-eligible individuals must be participating in work activities for an average of at least fifty-five (55) hours per week to count as a two-parent family engaged in work for the month. At least fifty (50) of the fifty-five (55) hours per week must come from participation in the activities listed in the Core Activities above. Above fifty (50) hours per week, the three (3) activities listed in Non-Core Activities above may also count as participation.

Teen Two-Parent Family Requirements

In a two-parent household in which both parents are under age twenty (20), the DHS worker should assess the educational history of both parents. For either parent who has not completed high school or obtained a GED, as a first activity in the RI Works program, the DHS worker should approve and enter an employment plan for that parent; or for both parents if neither have the high school diploma or GED; that shows full time attendance in secondary education or completion of a GED program as the first activity. When both have either reached the age of twenty (20) or completed the first activity of education as described above, all two parent family rules will come into full force and effect.

Exemptions for Two-Parent Families

The work requirements shall not apply if, and for so long as, the Department finds that:

• both parents receive Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI); or

• both parents have completed applications for SSI or SSDI and both have been determined by a designated DHS vendor to be likely to become eligible for SSI or SSDI; or

• one parent is caring for a child or family member with a significant documented disability who resides in the home, and who requires full time care and the other parent receives SSI/RSDI/SSDI and is medically documented to be unable to provide care for the disabled family member.

#### c. Ensure that parents and caretakers receiving assistance engage in work in accordance with section 407 (section 402(a)(1)(A)(iii) of the Social Security Act). Consistent with the required strategic elements discussed in section II (a)(2) herein, provide a specific analysis of how the State’s workforce development activities are addressing employment and training services for parents or caretakers receiving assistance

How Workforce Activities Address Employment and Training Services

RI Works employment plans are comprised of a component and several activities associated with each component. Each activity is centered around building up the participant, providing coaching, long term goal setting, and barrier mitigation on that recipient’s pathway to a more stable future. Every employment plan is comprised of at least one component and one activity. All activities are focused on engaging that family with holistic services to provide a change in their family’s pathway to self- sufficiency. The five components in RI are organized to be step system to provide services for families so they can access training and work preparation. These components include: Supportive Services to help stabilize families in crisis with the goal of long term self-sufficiency; Teen and Family Development provides education services for parents under 20 year of age; Adult Education so parents can enter training or workforce services that have minimum education requirements; Vocational Training to provide specific trainings for parents in fields that are seeking employees; and Work Readiness which provides work experience and interview skills with a job search focus.

Non-Compliance with Work Requirements

All parents and caretaker relatives not specifically exempted are required to participate in an employment plan and appropriate activities. Failure to do so may result in a penalty, if good cause is not provided for the non-participation. Current policy states: During the first three (3) months of noncompliance with work requirements, the amount of cash assistance to which an otherwise eligible family is entitled shall be reduced by the portion of the family's benefit attributable to a parent who, without good cause, has failed to enter into an individual employment plan or has failed to comply with his or her individual employment plan; provided that the reduction shall be applied during the first three (3) months, whether or not consecutive, of such failure or non-compliance by the parent. For a family size of two (2), the benefit reduction due to noncompliance with the employment plan shall be computed utilizing a family size of three (3), in which the parent's portion equals one hundred thirty-seven dollars ($137).

After three (3) months of noncompliance, the Department shall terminate cash assistance to a family if any parent in the family has failed, without good cause, to enter into an individual employment plan, or to comply with his or her individual employment plan and has been penalized for three (3) months, whether or not consecutive.

The penalty becomes effective on the next payroll date after the adverse action period. The participant is notified of the penalty by a system-generated notice.

If the family's benefit has been reduced for less than three (3) months, whether or not consecutive, due to the parent's failure to enter into an individual employment plan or failure to comply with the terms of his or her individual employment plan, benefits shall be restored to the full amount beginning with the initial payment made on the first of the month following the month in which the parent (1) enters into an individual employment plan and demonstrates compliance with the terms thereof, or (2) demonstrates compliance with the terms of his or her existing individual employment plan, as such plan may be amended by agreement of the parent and the Department.

If the family's benefit has been terminated due to the failure by one or more parents to enter into an individual employment plan or failure to comply with the terms of his or her individual employment plan and has been penalized for three (3) months, the family may re-apply for benefits and benefits shall be restored to the family in the full amount the family is otherwise entitled to under this chapter beginning on the first of the month following the month in which all parents in the family who are subject to the employment plan requirements (1) enter into an individual employment plan and demonstrate compliance with the terms thereof, or (2) demonstrate compliance with the terms of his or her existing individual employment plan, as such plan may be amended by agreement of the parent and the Department, i.e., the parent must sign a new Employment Plan, demonstrate compliance with the Plan for at least two (2) weeks, and continue to participate, for the penalty to be considered cured and the case accepted beginning with the first of the month following the month that she or he began to comply.

#### d. Take such reasonable steps as the State deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the Federal Government (section 402(a)(1)(A)(iv) of the Social Security Act)

In accordance with the General Laws of Rhode Island 40-6-12 all records pertaining to the administration of public assistance are declared to constitute confidential matter. It is unlawful for any person to make use of, or cause to be used, any information contained in these records for purposes not directly connected with program administration, except with the consent of the individual concerned. Any person violating any provisions of this state law, or the lawful rules and regulations made there under will be deemed guilty of a misdemeanor and fined not less than two hundred dollars ($200) or will be imprisoned for not more than six (6) months or both.

#### e. Establish goals and take action to prevent and reduce out-of-wedlock pregnancies, with special emphasis on teenage pregnancies (section 402(a)(1)(A)(v) of the Social Security Act)

1. Rhode Island's Comprehensive Statewide Teen Pregnancy Prevention Plan

DHS had an active role in a formal partnership with the RI Department of Health (RIDOH), Department of Education, the Department for Children, Youth and Families, and several community-based organizations, the partnership was originally formed to address the complex issues of teenage pregnancy and to develop Rhode Island’s Comprehensive Statewide Teen Pregnancy Prevention Plan. The Plan lead by RIDOH, which was completed in June 1999 and revised in 2004, was based on research findings, results of community forums, and professional expertise in teenage pregnancy prevention. The Plan contained information on federal and state funding sources, programs that educate at-risk teens, programs that provide pregnancy prevention education, a review of current literature pertaining to this topic, state level initiatives and financial resources for teach training.

That prevention plan was the basis for the collaboration between DHS and RIDOH for the Youth Success program, now called Teen and Family Development (TFD). TFD has been a collaborative effort with both RIDOH and DHS vendors meeting regularly to ensure that both TFD and Medical eligible youth are being educated about the programs in both DHS and RIDOH. A cross referral for these programs ensures that young parents are aware of programs and able to access RI Works. Additionally, RI Works vendors are conducting pregnancy prevention outreach as well as intensive services for “at risk” youth. A service within TFD includes life skills training focused on preventing pregnancy.

The Department also contracts with additional Community Based Organizations to provide teen services across the State. These contracts have a targeted focus of supporting efforts to prevent teen pregnancy and serve pregnant and parenting teens. Provide pregnancy prevention, career exploration or goal setting, financial literacy, and leadership skills to RI youth.

2. Youth Responsibility and the Adolescent Self-Sufficiency Collaborative became the Teen and Family Prevention

Since April 1, 2009, the Department began contracting with an association of nine (9) community-based organizations to provide an intervention program for at-risk and pregnant/parenting populations, formerly called the Youth Success Program, now called Teen and Family Development (TFD). All contracted organizations had either their own educational (GED) program or access to each other’s programs, should a teen not remain in high school, which is the primary educational goal. Academic instruction focused on a high school diploma or its equivalent, pregnancy prevention education, skills development, service learning, and career exploration/work experience. The TFD program provided case management services, referrals to health and dental care to ensure needs are met, improves teen character development and increases life skills, especially academic and parenting skills. Substance abuse services, domestic abuse/trauma services, mental health services and coordination with the Office of Child Support Services are all present in-house in these nine-member agencies.

The Family Needs Assessment used by TFD is in compliance with the ACF’s Teen Parent Responsibility Plan. As partner agencies may also operate Early Head Start, Head Start and licensed child care centers, participating youth receive priority for Head Start and child care services when appropriate. Further, as three of these agencies are regional leads in the Family Care Community Partnership (FCCP) operated by RI’s Department of Children, Youth and Families, outreach is coordinated with the FCCP to reduce instances of teen pregnancy. An example of this Department’s partnership with the FCCP and with the RI Department of Health (RIDOH) is the joint effort to add resources to the Nurse-Family Partnership Program and other Family Visiting Programs by RIDOH. Using strategies scientifically proven effective to reduce initial and repeat pregnancy, the TFD works with teens, individually or in groups, in schools, in community sites, and/or in the teens’ own homes. The TFD also tracks, monitors, and reports to DHS each pregnant and parenting teen’s school attendance and works to resolve issues of non-compliance with DHS requirements, such as attending school.

Minor parents are required to live at home with their parents, with a relative, or a legal guardian in order to be eligible for cash assistance through the RI Works Program. Unless otherwise authorized, the cash assistance is issued to the parent, relative, or the legal guardian on behalf of the minor parent. When there is good cause for a minor parent to live outside the allowable living arrangements above, and there is no suitable relative or legal guardian, the minor parent must live in an adult-supervised supportive living arrangement which ensures regular adult supervision and which requires the minor parent to participate in secondary education and the TFD program.

As of March 2018, Youth Success was renamed to Teen and Family Development (TFD). TFD is now part of the performance-based contracts for vendors overseeing RI Works activities. Two prime vendors are contracted for TFD. The previous principles and standards for Youth Success are largely the same for TFD. Both vendors are working cooperatively with the RI Department of Health (RIDOH), to continue a close partnership with the Nurse Family Partnership and other family visiting programs. Joint meetings are held between RIDOH, DHS, and all vendors to ensure coordinated services for this population.

3. New Opportunity Homes

New Opportunity Homes (NOH) is a key component of DHS’s teen and young adult programs. The New Opportunity Homes are supervised living arrangements which offer an alternative option for pregnant and parenting RI Works Program applicants/recipients who are unable to remain at home with their own parents or guardians. New Opportunity Homes provide young adults with a positive environment that is safe and nurturing. A multi-disciplinary team reviews prospective residents to determine the appropriateness of a NOH, using screening criteria and assessments to assure that participant’s needs may be met by a NOH. Moreover, each resident is assigned a case manager. Together, the NOH and the case management agency offer each resident educational supports and opportunities to develop social and life skills, including parenting skills, necessary to become positive parents and self-sufficient, productive adults.

#### f. Conduct a program designed to reach State and local law enforcement officials, the education system, and relevant counseling services, that provides education and training on the problem of statutory rape so that teenage pregnancy prevention programs may be expanded to include men (section 402(a)(1)(A)(vi) of the Social Security Act)

Rhode Island’s Comprehensive Statewide Teen Pregnancy Prevention Plan has recommended that “Rhode Island should clarify, communicate, enforce and strengthen existing statutory rape and child molestation laws.” A collaborative effort has therefore developed between each Teen and Family Development (TFD), and the DHS funded Domestic Violence Prevention program which provides education and training on the problems of statutory rape and child molestation to state and local law enforcement officials, educators, and adolescent counselors, all of whom are required to notify the RI Department of Children, Youth and Families when sexual abuse of a child is suspected. The TFD Program outreaches fathers in an effort not only to establish paternity and child support, but to encourage them to maintain an emotional relationship with their child. TFD is open to all eligible participants, regardless of sex, so that the recipient can receive specific services aimed to maximize services to younger RI Works recipients. DHS works with the Office of Child Support Services that provides services to non-custodial parents to seek work training opportunities and other resources such as counseling, if needed.

In accordance with Section 402(a)(8) of the Social Security Act (42 U.S.C. 602(a)(8)); Consolidated Appropriations Act, 2022, section 703), Rhode Island herein certifies compliance with the new expanded “Family Violence Option”. The Family Violence Option provides enhanced flexibilities within Temporary Assistance for Needy Families (TANF) for domestic violence survivors. These enhanced flexibilities for Rhode Island Works recipients include exemptions from work activities, waiver from non-custodial parent requirements, and address blocks to safeguard customer wellbeing.

Rhode Island has established a contractual agreement with the Rhode Island Coalition Against Domestic Violence (hereafter Coalition) to assist the Rhode Island Department of Human Services (hereafter Department) with the expansion to the current domestic violence protections and trainings for TANF. The Coalition, with assistance from the Department’s training unit, will create and record trainings for the Department’s staff as well as conduct trainings for case managers, potential TANF applicants, and TANF applicants in accordance with the below.

#### g. Implement policies and procedures as necessary to prevent access to assistance provided under the State program funded under this part through any electronic fund transaction in an automated teller machine or point-of-sale device located in a place described in section 408(a)(12), including a plan to ensure that recipients of the assistance have adequate access to their cash assistance (section 402(a)(1)(A)(vii) of the Social Security Act)

RI's EBT Restrictions

Pursuant to Section 4004 of Public Law 112-96, it is prohibited for a TANF recipient to use their TANF cash assistance benefits received under RI Works, Rhode Island General Laws 40-5.2 et seq., in any electronic benefit transfer transaction (EBT) in:

• any liquor store;

• any casino, gambling casino, or gaming establishment; or

• any retail establishment which provides adult-oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment.

DEFINITIONS - For purposes of above:

LIQUOR STORE- The term ‘liquor store’ means any retail establishment which sells exclusively or primarily intoxicating liquor. Such term does not include a grocery store which sells both intoxicating liquor and groceries including staple foods (within the meaning of section 3(r) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(r))).

CASINO, GAMBLING CASINO, OR GAMING ESTABLISHMENT- The terms ‘casino’, ‘gambling casino’, and ‘gaming establishment’ do not include:

• a grocery store which sells groceries including such staple foods and which also offers, or is located within the same building or complex as, casino, gambling, or gaming activities; or

• any other establishment that offers casino, gambling, or gaming activities incidental to the principal purpose of the business.

It is illegal to withdraw TANF benefits from an ATM located in one of the prohibited locations, or to use TANF benefits at a point of sale (POS) terminal located in a prohibited location.

Rhode Island will compile a report of the EBT restricted transaction quarterly. Any person receiving cash assistance through the RI Works program who uses an EBT card in violation shall be subject to the following penalties:

• For the first violation, the household will be sent a warning that a prohibited transaction occurred;

• For the second violation, the household will be charged a penalty in the amount of the EBT transaction that occurred at the prohibited location;

• For the third and all subsequent violations, the household will be charged a penalty in the amount of the EBT transaction that occurred at the prohibited location AND for the month following the month of infraction, the amount of cash assistance to which an otherwise eligible recipient family is entitled shall be reduced by the portion of the family's benefit attributable to any parent who utilized the EBT card in a restricted location. For a family size of two (2), the benefit reduction due to noncompliance with use of EBT at a restricted location shall be computed utilizing a family size of three (3), in which the parent's portion equals one hundred thirty-seven dollars ($137).

If an individual believes that the intended action regarding usage of EBT cash at restricted locations is incorrect, they may request a hearing before the Executive Office of Human Services Hearing Officer within thirty (30) days of the mailing of the notice of adverse action. The individual may request that benefits be continued pending the outcome of the hearing if the request is made within ten (10) days of the mailing of the notice.

Adequate Access to Cash Assistance

Recipients, and authorized payees, access EBT cash benefits by using a plastic Rhode Island EBT card and their personal identification number (PIN). The RI EBT system provides access to cash benefits at bank, credit union, and retail store automated teller machines (ATMs). Some retail establishments also provide access to cash accounts at point-of-sale (POS) terminals which display the QUEST logo. This service is called a cash back transaction and policies on its availability and limits on the amount of cash dispensed are set by the individual store. The EBT card can be used in RI and nationwide at participating ATMs and point-of-sale (POS) devices. Any location that uses the NYCE or QUEST logo will allow for EBT card usage. There are over 900 POS locations statewide alone, these locations are in every city and town in Rhode Island.

#### h. Ensure that recipients of assistance provided under the State program funded under this part have the ability to use or withdraw assistance with minimal fees or charges, including an opportunity to access assistance with no fee or charges, and are provided information on applicable fees and surcharges that apply to electronic fund transactions involving the assistance, and that such information is made publicly available (section 402(a)(1)(A)(viii) of the Social Security Act)

The term ‘electronic benefit transfer transaction’ means the use of a credit or debit card service, automated teller machine, point-of-sale terminal, or access to an online system for the withdrawal of funds or the processing of a payment for merchandise or a service. Payment of RI Works Program cash benefits through an electronic benefit transfer (EBT) system is authorized by RIGL. 40-5.2-31. Cash benefits are credited to an EBT account in the recipient's name on the first and sixteenth of the month including weekends and holidays.

Recipients, and authorized payees, access EBT cash benefits by using a plastic Rhode Island EBT card and their personal identification number (PIN). The RI EBT system provides access to cash benefits at bank, credit union, and retail store automated teller machines (ATMs). Some retail establishments also provide access to cash accounts at point-of-sale (POS) terminals which display the QUEST logo. This service is called a cash back transaction and policies on its availability and limits on the amount of cash dispensed are set by the individual store. The EBT card can be used in RI and nationwide at participating ATMs and point-of-sale (POS) devices. Any location that uses the NYCE or QUEST logo will allow for EBT card usage. There are over 900 POS locations statewide alone, these locations are in every city and town in Rhode Island.

Each month, recipients can make a total of two (2) free cash withdrawals from ATMs. For each additional ATM cash withdrawal in the month, a fee of two dollars is charged. The fee is automatically deducted from the recipient's cash benefit account. No fee is charged when cash benefits are accessed at POS terminals.

RI EBT cards are issued via mail, or under certain circumstances issued in a DHS field office using special card printing. Cardholders must report lost, stolen, or damaged RI EBT cards to the Customer Service Help Line at 1-888-979-9939. A Customer Service Representative invalidates the card thereby protecting the unused benefit amounts. If someone uses the card before its status has been changed, the benefits cannot be replaced. No fee is charged for the replacement of any lost, stolen, or damaged RI EBT card. Cardholders may request a new card by contacting the local DHS office and completing a DHS EBT-10, EBT Replacement Form. Replacement RI EBT cards are mailed by noon the next business day after the authorization file has been successfully transmitted.

Fees And Surcharges for EBT Transactions

The following verbiage is on the EBT usage brochure provided to RI Works clients and available at all DHS field offices:

There is never a transaction fee for using your Cash Benefits to get cash at a POS machine. At ATMS, after your second cash withdrawal in a month, a two dollar transaction fee is automatically taken out of your Cash account each time you withdraw cash. A surcharge is an additional fee that can be charged by the owner of an ATM or POS for using that machine. Surcharges will be taken from your account automatically. If you do not want to pay the surcharge, cancel the transaction and go to another ATM or POS location that does not charge a surcharge.

DHS Website

In addition, the RI Works policy, including EBT information on fees and surcharges is located on the DHs website: [Supplemental Nutrition Assistance Program (SNAP) | RI Department of Human Services](https://dhs.ri.gov/programs-and-services/supplemental-nutrition-assistance-program-snap) and the RI Secretary of State website at: [Rhode Island Works Program Rules and Regulations (218-RICR-20-00-2) - Rhode Island Department of State](https://rules.sos.ri.gov/regulations/part/218-20-00-2).

#### i. Indicate whether it intends to treat families moving from another State differently from other families under the program, and if so how (section 402(a)(1)(B)(i) of the Social Security Act)

The State of Rhode Island does not intend to treat families moving into the state differently than established residents.

#### j. Indicate whether it intends to provide assistance to non-citizens, and if so include an overview of the assistance (section 402(a)(1)(B)(ii) of the Social Security Act)

The RI Works Program has adopted the provisions in section 402 (b) of PRWORA with regard to legal non-citizens. This requirement to comply with PRWORA will remain in effect according to all applicable changes made to the federal law, as that Act may hereafter be amended. Legal non-citizens must meet income and resource criteria including their sponsor’s income and resources. Such individuals will be eligible for cash assistance at the same levels and under the same rules as citizens. In order to be eligible, the non-citizen must be:

• A qualified non-citizen who entered the U.S. prior to 8/22/96; or

• A qualified non-citizen who entered the country on or after 8/22/96 and is exempt from the five (5) year ban as defined below; or

• After the five (5) year ban, a qualified non-citizen who entered the U.S. on or after 8/22/96.

Qualified non-citizens who are exempt from the five (5) year ban include:

• Refugees, under section 207 of the Immigration and Nationality Act (INA);

• Asylees, under section 208 of the INA;

• Amerasian entrants as defined under section 584 of the Foreign Operations, Export Financing and Related Programs Appropriations Act of 1988;

• Cuban or Haitian entrants under section 501 (e) of the Refugee Education Assistance Act of 1980;

• Lawfully residing honorably-discharged veterans (except one discharged for reasons of immigration status), and the non-remarried widow or widower of the veteran;

• Non-citizens on active duty in the U.S. Armed Forces, their lawfully residing spouses and unmarried dependent children;

• Battered victims with a petition pending under 204 (a) (1) (A) or (B), or 244 (a) (3) of the INA; or

• Victims of human trafficking in accordance with section 107 (b) of the Victims of Trafficking and Violence Protection Act of 2000.

Qualified non-citizens who entered the U.S. on or after 8/22/96, who are subject to the five (5) year ban include:

• Lawful permanent residents (LPR)

• Parolees for at least one (1) year under 212 (d) (5) of the INA

• Conditional entrants under 203 (a) (7) of immigration law in effect before 4/1/80

• Certain American Indians born outside the U.S.

A person who is not a United States citizen and does not meet the alienage requirements established in PRWORA, as amended, is not eligible for cash assistance. Those applicants who are ineligible include undocumented and/or illegal immigrants and persons documented as temporary visitors.

#### k. Set forth objective criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment, including an explanation of how it will provide opportunities for recipients who have been adversely affected to be heard in a State administrative or appeal process (section 402(a)(1)(B)(iii) of the Social Security Act)

Rhode Island provides an objective process for the delivery of benefits and the determination of eligibility, for fair and equitable treatment, and for complaints and an appeals process for those recipients that have been adversely affected. Specific details pertaining to the policy and procedures are contained in Rhode Island DHS Manual Sections Civil Rights Compliance and Complaints and Hearings.

Furthermore, a parent or caretaker who requests assistance for a child shall meet or speak with an agency representative as soon as possible and no later than five (5) days from the date of request for assistance. The application for assistance shall be accepted or denied by the Department no later than thirty (30) days following the date of application.

A family found by the Department to meet the eligibility criteria shall be entitled to receive cash assistance from the date of submitting a signed application. The family members shall be eligible for cash assistance for so long as they continue to meet the eligibility criteria and parents shall be eligible so long as they meet the terms and conditions of the work requirements.

Any applicant or recipient aggrieved because of a decision by the Department, including but not limited to, a decision regarding eligibility for benefits, the amount of benefits, terms of an Employment Plan or a delay in making a decision with respect to an application for assistance shall be entitled to an appeal. The Department shall provide an applicant with written notice of a decision to deny benefits and shall provide recipients written notice at least ten (10) days in advance of a decision to terminate or reduce benefits to the family. Notices shall be in easy to understand language and shall explain the reason for the Department's decision and cite the relevant section of the Department's regulations. The family may appeal the decision by filing a written request with the Department within thirty (30) days of the date the notice was mailed. If the recipient files the request within ten (10) days of the date the notice was mailed, the recipient may receive benefits without reduction pending the outcome of the appeal. Hearings with respect to public assistance shall be conducted by the Department

#### l. Indicate whether the State intends to assist individuals to train for, seek, and maintain employment (Section 402(a)(1)(B)(v) of the Social Security Act)—

##### 1. Providing direct care in a long-term care facility (as such terms are defined under section 1397j of this title); or

##### 2. In other occupations related to elder care, high-demand occupations, or occupations expected to experience labor shortages as, determined appropriate by the State for which the State identifies an unmet need for service personnel, and, if so, shall include an overview of such assistance.

The Patient Protection and Affordable Care Act of 2010 added a provision to the Social Security Act requiring each state to indicate its intention to assist individuals in training for, seeking and maintaining employment in the eldercare workforce. Rhode Island notes its status as one of the most elder-populated states (proportionately) in the country, and has been proactive historically in ensuring our TANF recipients are prepared to work effectively in this field which serves 16.8% of the state’s population (2017 census). The current national average is that the elderly represents 15.6% of the US population, and this proportion will increase both nationally and in Rhode Island, per the Administration on Aging. It is predicted that, in 2030, elderly persons will be 19.7% of the national population, and 21.4% of Rhode Island’s population.

Vocational trainings, which the Department supports for TANF recipients who choose them, in the areas of Healthcare Exploration, Homemaker, Certified Nursing Assistant and Medical Assistant are provided by multiple agencies in Rhode Island. These agencies have incorporated much material devoted to preparation for work with the elderly

#### m. Provide for all MOE-funded services the following information: the name of the program benefit or service, and the financial eligibility criteria that families must meet in order to receive that benefit or service. In addition, for TANF MOE-funded services (co-mingled or segregated MOE) describe the program benefit provided to eligible families (SSP services do not have to include a description but the Department of Health and Human Services encourages it) (§263.2(b)(3) & §263.2(c) preamble pages 17826-7)

The State of Rhode Island expends funds to administer and support a range of benefits and services to assist low income needy children and families. For purposes of Rhode Island’s TANF State Plan, the definition of low-income needy family means a family which includes a dependent child(ren) under age 18, or 19 if full-time student, and a parent/caretaker relative with a gross household income level which is at or below 225% of the Federal Poverty Level (FPL). While it is recognized that income and resource limits may differ somewhat from program to program, in order to receive benefits or services through programs described in this section of the R. I. TANF State Plan, a family must meet this state’s definition of low income.

The following outlines benefits and services which are funded as either a separate State Program and meets one or more of the four purposes of TANF and thus qualify as state maintenance of effort (MOE) expenditures, claimable under TANF regulations.

1. Separate State Programs:

• Child Care Assistance for both cash assistance and non-cash low income working families

– Child care subsidies are provided to active RI Works parents engaged in approved activities and for all low income working families engaged in employment for 20 or more hours per week, as well as low income youth enrolled with the Teen and Family Development program who are completing their high school diploma or GED with employment plans for at least 20 hours/week. Current eligibility criteria for non-cash assistance parents who meet the income criteria are outlined in Rhode Island’s Child Care and Development Fund (CCDF) State Plan. Child Care Assistance ends dependence of needy families on government benefits by promoting job preparation and supporting working families. Consistent with TANF Purpose 2.

• State funded Head Start Services for low-income children who are not able to be served through federally funded Head Start Programs - State-funded head start is a means tested program and accepts only those families who are determined low income needy as defined above. Children between 3 and 4 years of age benefit by school readiness programs and parent involvement which is required by all families and these parents gain information about adult education, job skills training and work opportunities, thus improving their ability to become economically independent. Consistent with TANF Purposes 1, 2, 3, 4.

• Emergency Assistance and residential services for vulnerable youth, through the RI Department of Children, Youth and Families - Emergency Assistance (EA) as allowed under prior law with direct TANF funding. supports the maintenance of services for those families who would have qualified for EA under the prior program as described in Rhode Island’s State Plan in 1995. Services are provided to children who are victims of abuse and/or neglect, or at risk of abuse and neglect. EA is used for TANF MOE only to the extent that State-only dollars are expended to support the range of family intervention, counseling and case management services provided. Separately, state-funded residential services through DCYF, for those with active reunification plans, also provide a safe temporary environment for children as families seek stability. In such circumstances, children may not be absent from the home for more than 180 days even if reunification plans are maintained. These expenditures are not matched with any other federal or non-federal funding source. Consistent with TANF Purposes 1 and 3.

• Child Support Pass-through payments to children - The state pass-through of eligible payments to children of non-custodial parents increases the family’s income and supports the likelihood that the custodial parent’s household income will increase, by both regular child support payments and with the TANF work program, their ability to prepare for and enter the job market. Consistent with TANF Purpose 2.

• Rental Assistance Payments through the State Community Action Fund - Rental assistance may be provided through CAP agencies using state-only dollars. Low income families qualify if they can demonstrate an ability to maintain themselves in the home or apartment and have a short-term need for special assistance. Consistent with TANF Purposes 1 and 4.

• State funded low income heating assistance - Low income families may receive state funded heating assistance during the year. This is administered by the RI Community Action Programs. Consistent with TANF Purposes 1 and 4. • State funded Supportive Housing and Development Services for low income families administered through Office of Housing and Community Development and Rhode Island Housing - The State of Rhode Island supports housing for low income families who need help in transitioning to permanent housing, who may be working toward qualifying for the purchase of affordable housing, or who need emergency intervention to prevent the loss of otherwise stable housing. Stable housing is a core need of families who are trying to prepare for or maintain themselves in a job. Consistent with TANF Purposes 1, 2, and 4.

• Governor’s Workforce Board job training and education for disadvantaged youth and adults – The RI Governor’s Workforce Board (GWB) has funded a significant number of programs throughout Rhode Island which are designed to provide low income youth and adults with job training and access to employment resources. Services include job finding skills and for many in Rhode Island, skill upgrading programs. Both youth and adults are either unemployed or underemployed and are held to a means tested application process. Some programs are geared to meet the special needs of young parents, for both custodial and non-custodial parents. Consistent with TANF Purposes 1, 2, 3, and 4. • State funded Adult Literacy Services - Rhode Island has adult education programs through the Rhode Island Department of Education (RIDE). RIDE has worked very closely with the TANF Program to create contextualized learning opportunities for low income parents who are not academically eligible for much post-secondary programming. - Consistent with TANF Purposes 1, 2, 3 and 4.

• Youth exiting the foster care system - Intervention and Treatment Services administered by RI Department of Children Youth and Families are essential services which help vulnerable youth to move into productive life skill/management programs. Services provided to youth are designed to ensure that they avoid early pregnancy, graduate high school, follow appropriate healthy living habits, and have access to responsible and supportive adults either within their respective families or through mentorships provided by programs paid for with state-only dollars. - Consistent with TANF Purposes 3, and 4.

• Under the category known as short-term, non-recurrent benefit programs, funds may emanate from state general revenue, charitable organizations, non-profit, or local government resources. Programs may include a benefit to a custodial parent in lieu of child support, a onetime benefit to those who qualify for Rhode Island’s Earned Income Tax Credit or to any lowincome family, including those receiving some form of public support, and one-time benefits may take any form, including but not limited to, food, restoration of utilities or avoidance of utility shut-offs, appliance replacement to enable food storage or meal preparation, auto repairs, or other basic necessities - Consistent with TANF Purposes 1 and 2.

• State-funded higher education grants to low-income youth helps families prepare older youth for careers - Consistent with TANF Purposes 2 and 3.

Systems for tracking and managing funding streams, beneficiary education, training, work activities, and other child and families support programs are in place as well as data reporting to meet requirements outlined in Final TANF Regulations. Administrative costs for technology would also be claimable as MOE under the State’s TANF Program.

2. Non-Assistance

The state supports several other MOE-funded services for low-income needy families including, but not limited to, recurring short-term benefits, as noted below.

• Short-term Cash Assistance or Benefit Programs - Under the RI Works Program, the state may implement a short term (not more than 4 consecutive months) cash payment or benefit program for qualifying applicants for cash assistance and low-income families. The state may also provide non-recurrent, short-term benefits to low income families while TANF Emergency Contingency Funds, or its successor legislation, is available to these families.

• State Earned Income Tax Credit - The Rhode Island State Earned Income Tax Credit (SEITC) has both a non-refundable as well as a refundable tax credit which is based upon twenty-five (25%) percent of the federal Earned Income Tax Credit. Consistent with RIGL. 44-20-2.6 (d) and 44-30- 98, Article 30, Rhode Island taxpayers filing for State EITC who meet both financial eligibility criteria as defined by federal tax law to claim EITC, and who have at least one (1) dependent child in their family, will receive a refundable amount equal to up to twenty-five (25%) percent of the federal EITC. The Rhode Island General Assembly may legislatively adjust, from time to time, the percentage of the federal rate used by this State, to determine the State EITC amount refunded to low income working families.

• Disaster Relief - The State of Rhode Island provides short-term non-recurring benefits to victims who have been affected by Hurricanes and other officially declared disasters from time to time.

• Property Tax Relief for Income Eligible Home Owners and Renters - The State of Rhode Island provides property tax relief in the form of tax refunds to individuals 65 and older, disabled individuals as well as non-disabled/non-elderly individuals and families who meet income eligibility requirements and who file for such tax refunds. Consistent with RIGL. 44-33, the refundable tax credit is based upon the amount that property taxes or rent constituting property taxes exceeds the amount of the low-income thresholds established in law and for purposes of TANF MOE, the State would only claim expenditures paid to low income families.

• Community-Based Work, Training, Housing, Food Assistance, Emergency Needs, and Family Support and Development Programs for low income parents and children funded through state and local non-profit funding streams such as:

The Annie E. Casey Foundation, the Rhode Island Foundation, the United Way of Rhode Island, which collectively support a wide range of employment and training, shelter, food assistance, emergency needs and community development initiatives targeted to improve outcomes for youth and families in the areas of economic self-sufficiency. Only non-matched qualifying funds and services may be claimed toward Rhode Island’s TANF MOE, including, but not limited to third-party and charitable contributions supporting the RI Community Food Bank’s distribution of food to low income Rhode Island families. Other non-profit agencies that contribute to TANF MOE include: The Roam Catholic Diocese of Providence, the Rhode Island Alliance of Boys and Girls Clubs, and the Salvation Army of Providence.

• State-funded Programs for Youth and Families administered through the Community Action Network. Programs and services funded through the RI Community Action Network assist children and families throughout the state. These state funded programs and services meet at least one or more of the four purposes of TANF and include but are not limited to youth development, state funded nutrition programs, energy, early childhood programs, housing services programs.

• State funded legislative grants to community based special programs and services. The State legislature funds a wide range of programs and services which benefit the needs of families, children and the community. Family intervention services, truancy intervention, substance abuse counseling, transportation, youth mentoring, parenting, and other types of special programs are delivered to at-risk youth, children, and/or parents. These services meet at least one of the four purposes of TANF.

• Adult Literacy and Job Training Development funded by the Governor’s Workforce Board. State funded programs which target youth as well as custodial parents and non-custodial parents are provided throughout the state for those who need basic education, GED, and job skills in order to compete in the Rhode Island job market. Such programs improve the economic well-being of youth and families by assisting both unemployed, under-employed individuals, some of whom may be transitioning from youth training school or adult correctional institution and need re-entry services. These programs are administered through the RI Department of Labor and Training, RI Department of Corrections, as well as the RI Department of Education. These goals are consistent with all four purposes of TANF and thus meet the requirements for TANF-MOE.

• State funded Supplemental Security Income (SSI). In accord with DHS Policy Section 0402.10, Standards of Assistance, SSI State Supplements paid to children and parents receiving Supplemental Security Income. These payments augment the federally funded SSI payments and assist families who are typically unable to improve their household resources because they are either unable to work themselves or must remain in the home to care for a disabled child(ren).

• RI Works Vendors - RI Works has contracted with vendors who are responsible for delivering services, managing work activities, reporting hours, and notifying DHS of required sanctions or closures. All contracts are performance based and critical for the success of the RI Works program. Vendors braid funding from a multitude of sources and are asked to contribute to TANF-MOE when applicable.

#### TANF Certifications

States that include TANF in the Combined State Plan must provide a certification by the chief executive officer of that State, that during the fiscal year, the State will:

| The State Plan must include | Include |
| --- | --- |
| 1. Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act); | Yes |
| 2. Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the state will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under the State Plan under title XIX. (section 402(a)(3) of the Social Security Act); | Yes |
| 3. Specify which state agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and private sector organizations (section 402(a)(4) of the Social Security Act)— |  |
| 3. (A) have been consulted regarding the plan and design of welfare services in the state so that services are provided in a manner appropriate to local populations; and | Yes |
| 3. (B) have had at least 45 days to submit comments on the plan and the design of such services; | Yes |
| 4. Provide each member of an Indian tribe, who is domiciled in the state and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the state program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act); | Yes |
| 5. Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the state program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act); | Yes |
| 6. (optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).— |  |
| 6. (A) screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals; | Yes |
| 6. (B) refer such individuals to counseling and supportive services; and | Yes |
| 6. (C) waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence (section 402(a)(7) of the Social Security Act). | Yes |
| 7 Establish and enforce standards and procedures to\*— |  |
| 7. (A) ensure that applicants and potential applicants for assistance under the state program funded under this part are notified of assistance made available by the state to victims of sexual harassment and survivors of domestic violence, sexual assault, or stalking; | Yes |
| 7. (B) ensure that case workers and other agency personnel responsible for administering the state program funded under this part are trained in— |  |
| 7. (B) 1. the nature and dynamics of sexual harassment and domestic violence, sexual assault, and stalking; | Yes |
| 7. (B) 2. state standards and procedures relating to the prevention of, and assistance for, individuals who are victims of sexual harassment or survivors of domestic violence, sexual assault, or stalking; and | Yes |
| 7. (B) 3. methods of ascertaining and ensuring the confidentiality of personal information and documentation related to applicants for assistance and their children who have provided notice about their experiences of sexual harassment, domestic violence, sexual assault, or stalking; and | Yes |
| 7. (C) ensure that, if a state has elected to establish and enforce standards and procedures regarding the screening for, and identification of, domestic violence, sexual assault, or stalking pursuant to paragraph (7)— |  |
| 7. (C) 1. the state program funded under this part provides information about the options under this part to current and potential beneficiaries; and | Yes |
| 7. (C) 2. case workers and other agency personnel responsible for administering the state programs funder under this part are provided with training regarding state standards and procedures pursuant to paragraph (7). | Yes |

### Trade Adjustment Assistance (TAA)

There are no program-specific state planning requirements for TAA. If the state includes TAA in a Combined State Plan, the state must incorporate TAA in its responses to the common planning elements in sections II, III, IV, and V of the WIOA State Plan requirements instrument.

Has the state incorporated TAA into the sections indicated above?

Yes

### Jobs for Veterans’ State Grants

(OMB Control Number: 1293-0017)

**Components of the Jobs for Veterans State Grants State Plan**

Jobs for Veterans State Grants (JVSG) recipients must provide a four-year state plan as a condition for the receipt of annual funding in accordance with 38 U.S.C. § 4102A(c). This plan must include responses to each of the components below.

#### a. Describe how the state intends to provide employment, training, and job placement services to veterans and eligible persons under the JVSG program (i.e., virtually and in-person).

Job Centers offer specialized services to eligible veterans and/or eligible persons under the Jobs for Veterans State Grant Program (JVSG). Non-JVSG staff will conduct an assessment to determine if a client is an eligible veteran or eligible person with one or more Significant Barriers to Employment (SBE), or additional populations as identified by the Secretary of Labor> If applicable, they may be referred to a Disabled Veterans Outreach Program (DVOP) Specialist or Military Employment Specialist/Consolidated Position (CP) staff to render individualized career services. DVOP Specialists (DVOPs) or CPs will conduct a comprehensive assessment of education, skills, and abilities of each referred veteran. This will include the development of the Individual Employment Plan (IEP) that identifies employment and training goals, interim objectives, and appropriate services that will enable the veterans to meet their goals. When a veteran is determined job ready and/or completes training, DVOPs will collaborate with Local Veterans Employment Representatives (LVER) and Job Center staff for information about veteran employment opportunities. When CPs determine veteran is job ready, the veteran will move into the employment phase of services, same as a LVER.  DVOP, CP, and LVER appointments are currently conducted through the Virtual Career Center (VCC) and by in-person appointments.

If training has been identified in the Individual Employment Plan, DVOPs and CPs will make an appropriate referral to a suitable training program including, but not limited to, the following:

1. Occupational Skills Training
2. On-the-Job Training
3. Job Readiness Training
4. Adult Education and Literacy
5. Employer Customized Training

In addition, DVOPs and CPs will continue to provide individualized career services, in combination with follow-up activities. DVOPs/CPs will monitor the veteran’s progress throughout training. When a veteran is determined to be job ready and/or completes training, DVOPs (and CPs as needed) will collaborate with the Local Veterans Employment Representatives (LVER, CPs) and Job Center staff for information about veteran employment opportunities. LVERs, CPs and/or Job Center Staff will provide eligible veterans and eligible persons with sufficient opportunities for job placement through the following services:

1. Referrals to local, state, and federal job opportunities
2. Training on “veteran-only” online employment resources
3. Referrals to employers who are interested in hiring veterans
4. Referrals to local federal defense contractors
5. Facilitating networking workshops, in conjunction with employers, that promote the benefits of hiring veterans; and
6. Promoting job fairs for veterans

LVER staff will conduct follow-up activities with employers to ensure veterans and eligible persons are successful throughout the hiring process.

#### b. List the populations to be served by Disabled Veterans’ Outreach Program (DVOP) and consolidated position staff, including the eligibility criteria for referral for DVOP services.

The eligible veteran population to be serviced under the JVSG program have been outlined in Veteran Program Letter (VPL) No. 03-14, VPL 03-14 Change 1 & 2. The targeted eligible veteran population (as defined in 38 U.S. Code § 4211) or eligible spouse (as defined 38 U.S. Code § 4101) attesting to one (or more) significant barriers to employment is as follows:

* 1. A special disabled or disabled veteran, as those terms are defined in 38 U.S.C 4211(1) and (3); Special disabled and disabled veteran are those:
     1. Who are entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or,
     2. Were discharged or released from active duty because of a service-connected disability;
  2. A homeless veteran, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. I 1302(a) and (b), as amended;
  3. A recently separated service member, as defined in 38 U.S.C § 4211(6)
  4. A veteran who has been unemployed for 27 or more weeks in the previous 12 months;
  5. An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration;
  6. A veteran lacking a high school diploma or equivalent certificate; or
  7. A low-income individual (as defined by WIOA Section 3 (36))

DVOPs may also serve additional population designated by the Secretary, in accordance with 07-14, 03-19, or most current guidance.

1. Veterans aged 18-24
2. Vietnam-era Veterans as defined in 38 U.S.C. 4211
3. Transitioning members of the Armed Forces who have been identified as in need of individualized career services;
4. Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in military treatment facilities or warrior transition units; and
5. The spouses or other family caregivers of such wounded, ill, or injured members

DVOPs outreach to veterans with one or more Significant Barriers to Employment (SBE). State strategies have also been developed to address veterans that do not qualify for federal homeless programs and/or Veteran Readiness and Employment (VR&E) services. The state will target non-qualifying veterans and refer them to the local Job Centers for re-employment and training services offered by Wagner-Peyser and WIOA.

Rhode Island’s veteran population includes incarcerated veterans who are served by the Department of Corrections along with the Job Center and DVOP staff after the veteran is released from the Adult Correctional Institution (ACI), and Native American veterans who receive services in collaboration with Job Center staff and the Rhode Island Indian Council in Providence. Through the collaboration with the Rhode Island Indian Council Native American veterans with SBE will be identified and outreached in an attempt to provide services by DVOP staff.

#### c. Describe the roles and responsibilities assigned to Disabled Veterans’ Outreach Program (DVOP) specialists, Local Veterans’ Employment Representative (LVER) staff, and consolidated DVOP/LVER positions by the state. These must be consistent with 38 U.S.C. 4103A and 4104.

**Disabled Veterans Outreach Program (DVOP) Specialists**

As an integral part of the State’s workforce system the DVOP staff’s primary focus is to

meet the needs of eligible veterans, eligible persons that have one or more Significant Barrier(s) to Employment (SBE), and other authorized populations. As outlined, under 38 U.S.C. 4103 (a), DVOP Specialists will provide individualized career services and facilitate job placements to meet the employment needs of veterans, prioritizing service to special disabled veterans, other disabled veterans, and other categories of veterans in accordance with priorities determined by the Secretary of Labor.

DVOP staff will only service eligible veterans with SBE, other eligible veterans, and eligible persons as defined by the Secretary of Labor. Veterans requiring individualized career services will be assigned to a DVOP Specialist after receiving an initial intake assessment conducted by the identified Job Center staff member or when referred by another agency that has determined to be eligible for DVOP services.

The DVOP Specialist will conduct a comprehensive assessment of education, skills, and abilities of each referred veteran. This will include the development of the Individual Employment Plan (IEP) that identifies employment goals, interim objectives, and appropriate services that will enable the veteran to meet their employment goals, recording all services in State’s MIS system (EmployRI.) Regular contact between the DVOP and participant by phone, in-person or virtually is utilized to provide participants with individualized and comprehensive services. Due to the pandemic, services are delivered in-person, via phone or conducted through the Virtual Career Center (VCC) and may be scheduled directly or on the backtoworkri.com website. All activities, services and case notes and appropriate data are entered by the DVOP Specialist into the state’s case management information system and virtual one-stop for monitoring and reporting purposes.

In order to maximize services to eligible veterans and eligible persons, DVOP staff conducts outreach activities in-person or virtually at a variety of sites including, but not limited to:

1. VA Veteran Readiness and Employment (VR&E)
2. Homeless Veterans Reintegration Program (HVRP) grantees
3. Department of Veterans Affairs Medical Center and Vets Center
4. Homeless shelters
5. Community Stand Down Events
6. State vocational rehabilitation agencies

**Local Veterans Employment Representatives (LVER)**

As an vital part of the state labor exchange system the LVER staff will focus on the primary role of employer outreach on behalf of the job ready veterans, as outlined in 38 U.S.C 4104 (b)

The principal duties of a LVER are:

* + Conduct outreach to employers in the area to assist veterans in gaining employment, including conducting seminars for employers and, in conjunction with employers, conducting job search workshops and establishing job search groups; All activities, services and case notes and appropriate data are entered by the LVER into the state’s case management information system and virtual one-stop for monitoring and reporting purposes and;
  + Facilitate employment, training, and placement services furnished to veterans in a state under the applicable state employment service delivery systems.

In the effort to promote the hiring and retention of eligible veterans and eligible persons the LVER staff perform outreach to local employers, small and large. To facilitate and promote the hiring of veterans LVERs establish a rapport with each employer by making employer site visits and following up with them via phone and email. This rapport allows the LVER to emphasize the benefits of hiring veterans to employers. LVER staff continue relationship building in response to the employer’s needs and objectives to retain better employees. LVERs plan employer workshops and promote job fair and recruitment events. LVERs also promote job development and provide information on hiring incentives for employers that hire and retain qualified veterans.

Integration of LVER staff in Job Centers connects the LVER with the Business Service Specialist (BSS) team to provide services to eligible veterans and employers. This integrated employer engagement team has both LVER and BSS who are crossed trained to share employer knowledge to the team. The MIS system is one of the methods used by the team which facilitated information sharing. Team meetings are also utilized to support direct transfer of knowledge. Registered Apprenticeship (RAP) is a proven model for businesses and job seekers. RAPS off the opportunity to train participants in high demand occupations, while the participants are earning wages. The LVER has direct contact with the DLT apprenticeship liaison to refer employers to become a Registered Apprenticeship within the State. The DLT liaison works closely with LVER and DVOP staff to increase the number of veterans and eligible persons within the apprenticeship program.

**Consolidated Positions (CP)**

**The consolidated position (CP) will be able to perform both duties of the LVER and DVOP that are mentioned above.**

The CP will encompass both the individualized career services and job placement facilitation to meet the employment needs of eligible veterans, and the role of employer outreach on behalf of the job ready veterans, as outlined in 38 U.S.C 4104 (b). These roles and duties are currently segmented between the Disabled Veterans Outreach Program Specialist (DVOP) and Local Veterans Employment Representative (LVER) positions. The CP will be a dedicated advocate who can speak to the needs of eligible veterans as well as act as an employment specialist with active employer relationships. The CP will be able to maintain relationships with both the eligible veterans and the employers in need, allowing individualized and consistent advocacy, and promoting more efficient administration of services for eligible veterans, and allowing enhanced services for both veterans and employers. This role will maintain the current hiring requirements specific to the DVOP/LVER positions and maintain training requirements for both roles as required.

#### d. Demonstrate the manner in which DVOP, LVER and consolidated DVOP/LVER staff are integrated into the state’s employment service delivery systems or American Job Center (AJC). This demonstration should show active engagement between JVSG and other AJC staff, such as through participation in staff meetings and cross-training opportunities.

The integration of DVOP and CP staff in each Job Center connects veteran clientele to all programs and services the Job Center has to offer. This may include partner programs such as Workforce Innovation and Opportunity Act (WIOA) or the State Office of Rehabilitation Services (ORS) and/or ongoing activities including job recruitments, workshops, computer classes and job fairs.

DVOP and CP staff are fully integrated members of the Job Center team and are required to actively participate in all Job Center activities so their clients can take full advantage of all available employment and training services. Staff meetings and training sessions amongst Job Center partner programs and agencies such as WIOA, Trade Adjustment Assistance Program (TAA), Rapid Response, Reemployment Services and Eligibility Assessment (RESEA), and employment services to partner programs including ORS, and RI Department of Elderly Affairs (DEA), Department of Human Services (DHS), are critical to the professional development of the DVOP and CP staff. Their participation in these partner staff meetings broadens their knowledge of programs and resources, thus improving their capacity to effectively serve their client base.

Veteran clientele benefit from the team approach for service delivery and internal networking among staff. On behalf of their clients, DVOP and CP staff are dedicated to the veteran’s program and work closely with partner staff whose expertise include WIOA, TAA, Rapid Response, RESEA, and Employer Services, as well as partner programs including ORS, DEA, and DHS. Outreach activities ensure that the veteran community is aware of the services provided by the DVOP and CP staff as well as the Job Center. To help veterans access and connect to Job Center partner programs, resources and services, outreach activities are conducted either in-person or, if possible, at the flowing locations:

* 1. Veteran Community Care Center at the VA Regional Hospital;
  2. Homeless Veterans Projects at the Rhode Island Veterans Home;
  3. Veteran Readiness and Employment (VR&E) unit at the VA Regional Office;
  4. TAPS seminars and follow-up activities at the Newport Naval Base;
  5. National Guard demobilization event; and
  6. Yellow Ribbon Events

Rhode Island employs a Veterans Employment & Training Manager to oversee the implementation and delivery of veteran services in the state. This individual is responsible for the assessment and monitoring of all services provided to veteran clients; ensuring compliance with federal Veterans Priority of Service requirements, coordination of services among partners, and the effective utilization of employment and training services. The success of this plan will be monitored and assessed by the review of case notes, regularly generated system

reports, and quarterly reports made available via the State’s EmployRI database. The LVER staff are integrated into the Job Center Business Service Unit and participate in monthly meetings to review and update current employer outreach strategies. These employer outreach reviews are to ensure that veterans and eligible persons are integrated into service delivery strategies. The Employer Engagement Integrated team allows the co-sharing of information about the workforce needs of employers in the community, as well as a direct communication pathway for Employers to learn about services that the State offers. This integrated team communicates both within the One Stop staff and meets with managers about how best to serve employers in the community. Both direct communication and an MIS system use, allow the knowledge to be easily available to the team.

Rhode Island recognizes the importance of dedicated veteran staff who can fully meet the needs of the military community of Rhode Island.

#### e. Describe the state's performance incentive award program to encourage individuals and/or employment service offices to improve and/or achieve excellence in the provision of services to veterans, including:

##### 1. the nomination and selection process for all performance incentive awards to individuals and/or offices;

Section 28.1 of the Collective Bargaining Agreement (CBA) between the State of Rhode Island and Local 401 of the Service Employees International Union states that both parties “agree to meet and discuss issues arising with regards to matters wholly omitted” in the current collective bargaining agreement. Per the terms of the CBA; management may not unilaterally create provisions not included within the contract, which would include any financial or nonfinancial performance based bonuses under the JVSG 1% set aside since such a program is not explicitly present in the current contract. Negotiation of such an incentive program covering only JVSG- funded staff persons would require renegotiation of entire collective bargaining agreement; a complex, laborious, and expensive process. For this reason, Rhode Island elects not to participate in the incentive award program as they are not reasonably compatible with current collective bargaining agreements.

##### 2. the approximate number and value of cash awards using the one percent incentive award allocation;

N/A

##### 3. the general nature and approximate value of non-cash performance incentive awards to be charged to the base allocation; and

N/A

##### 4. any challenges the state may anticipate to carrying out a performance incentive award program as mandated by 38 U.S.C. § 4102A(c). This should include any state laws or policies that prohibit such awards, if applicable. Describe the state's efforts in overcoming those challenges.

Section 28.1 of the Collective Bargaining Agreement (CBA) between the State of Rhode Island and Local 401 of the Service Employees International Union states that both parties “agree to meet and discuss issues arising with regards to matters wholly omitted” in the current collective bargaining agreement. Per the terms of the CBA; management may not unilaterally create provisions not included within the contract, which would include any financial or nonfinancial performance based bonuses under the JVSG 1% set aside since such a program is not explicitly present in the current contract. Negotiation of such an incentive program covering only JVSG- funded staff persons would require renegotiation of entire collective bargaining agreement; a complex, laborious, and expensive process. For this reason, Rhode Island elects not to participate in the incentive award program as they are not reasonably compatible with current collective bargaining agreements.

#### f. List the performance targets for direct services to veterans provided by JVSG staff, as measured by participants’:

* employment rate in the second quarter after exit from the program;
* employment rate in the fourth quarter after exit; and
* median earnings in the second quarter after exit.

| **JVSG Performance Measures** | **Goals** |
| --- | --- |
| Employment Rate 2nd Quarter After Exit | **63.3%** |
| Employment Rate 4th Quarter After Exit | **61.0%** |
| Median Earnings 2nd Quarter After Exit | **$9,000.00** |

### Unemployment Insurance (UI)

(OMB Control Number: 1205-0132)

The Unemployment Insurance (UI) program requires a State Quality Service Plan (SQSP) on a 2-year planning cycle that is a condition of receipt of administrative funding to administer the program. The SQSP is the State’s UI performance management and planning process that allows for an exchange of information between Federal and State partners to enhance the UI program’s ability to reflect their joint commitment to performance excellence and client-centered services. A formal two-year SQSP is submitted biennially. On the off years, States may be required to modify the SQSP with additional corrective action plans and narrative if they are failing any new performance measures, and they are required to provide updated budget documents, certifications, and assurances. ETA Handbook No. 336, 18th Edition provides detailed guidance for the preparation and submittal of the SQSP and supplemental guidance is provided in an annual UIPL, issued as UIPL 15-19 for the FY 2020  SQSP. The Social Security Act (SSA) sections 302 and 303 authorize the Secretary of Labor to provide funds to administer the UI program and govern the expenditure of those funds. States that choose the option to include UI in a WIOA Combined State Plan will be required to submit their SQSP through the Combined State Plan process. The SQSP must be prepared in accordance to the instructions in ET Handbook 336, 18th Edition and there are no changes to the established SQSP cycle if a State chose to submit their SQSP through the Combined State Plan process.

#### a. Contents of a Complete UI SQSP Package

A complete UI SQSP package includes the following documents, as described in Chapter 1, ETA Handbook 336, 18th Edition:

##### 1. Transmittal Letter

A cover letter to the appropriate Regional Office (RO) transmitting all the required SQSP documents.

October 11, 2023

Mr. Gregg H. Weltz

Regional Administrator

U.S. Department of Labor

Employment and Training Administration

25 New Sudbury St. Room E-350

Boston, MA 02203

Dear Mr. Weltz,

The Rhode Island Department of Labor and Training is pleased to submit the enclosed documents for the Fiscal Year 2024 State Quality Service Plan (SQSP).

If you have any questions or concerns regarding the State's SQSP materials, please contact Philip D’Ambra Administrator, Director of Income Support at philip.l.dambra@dlt.ri.gov

Please note the SF-424 A will be submitted through grants.gov.

Sincerely,

Matthew D. Weldon

Director

CC: Alicia Appugliese

##### 2. Budget Worksheets/Forms

Budget worksheets/forms and plan for program administration based on projected allocations received from the Federal partner. These forms include Worksheet UI-1 and SF 424, SF 424A and SF 424B. The SF 424A is only required if the State vary the quarterly distribution of base claims activity staff years.

Regarding SF-424 to be indicated at end of applicable section -

Descriptive Title of Applicant’s Project: Unemployment Insurance Administration

Funding Total: $13,700,213.00

Project Start: 10/01/2023 Project End: 09/30/2024

Authorizing Representative: Mr. Matthew D. Weldon, Director

A signed copy of the SF-424 and other appropriate budget-related forms are maintained with the State Agency and the Regional Office. Please see appendix for additional materials.

##### 3. The State Plan Narrative

State Plan Narrative is a vital element of the SQSP that provides a vehicle for sharing with the Federal partner State-specific efforts that affect the administration of the UI Program. The State Plan Narrative allows the State to describe in a single narrative: a) State performance in comparison to the Government Performance Review Act goals; b) actions planned to correct deficiencies regarding UI programs, UI program reviews and reporting requirements; and c) results of customer satisfaction surveys (optional).

1. **Overview**

1. ***State priorities and the strategic direction the state has adopted to ensure continuous improvement.***

For fiscal year and 2024, the Department is committed to continue focusing on the following priorities.

1. *Enhance customer’s experience with online claim resources, providing them secure access to online claim processing, claim status and self-service options.*
2. *Improve performance to achieve federal measures.*
3. *Continue focus on reemployment through the federal RESEA and state’s Back to Work programs.*
4. *Improve detection and prevention of Identity Theft benefit payments and applications.*
5. *Reduce improper payment rate and increase detection and recovery of UI overpayments.*
6. *Increasing equitable access to Unemployment Compensation.*
7. *Continue work with federal partners to implement plain language on customer notices.*

1. ***Assessment of past performance and expected future performance.  Includes, at state discretion, a discussion of external factors that may have performance implications.***

1. *Benefits*

*First Payments*

Rhode Island has continued to meet the first payment standards. We have been monitoring this measurement weekly and continue to communicate the importance of paying benefits timely to all staff in the Department.

*Nonmonetary*

As indicated in the CAP workbook, Rhode Island is failing nonmonetary timeliness and quality standards. These performance measures are a top focus of the management team overseeing these decisions. Despite hiring staff throughout the recent years, the level is not sufficient to maintain timeliness scores. Additionally, an increase in failure to report to RESEA appointments has inundated the unit with added cases. As indicated in the CAP workbook, a plan to automate decisions for RESEA is in place and we are expecting to free up time on our calendar which will increase staff’s time between being assigned a case and that case being due. In September 2023 we were approved to hire an additional 4 staff. We anticipate that will also provide some relief in the scheduler for cases, hopefully resulting in increased timeliness scores. Finally, the quality scores of the nonmonetary cases will continue to be monitored. Feedback will be provided to the staff and common errors detected will result in enhanced training for the unit.

1. *Appeals*

Rhode Island has been able to eliminate two CAPS from the FY 2023 workbook related to appeals. The remaining areas we are failing are Lower Authority Appeals timelapse for both 30 and 45 days. However, as reported in quarter ending 6/30/23’s CAP update, we are now meeting those two measures as well. The plans indicated in the CAP workbook have helped us reach these goals and we anticipate continued success in this area.

1. *Tax*

Rhode Island has now successfully passed the effective audit measure.

1. *Integrity*

*Improper payments*

We continue to struggle with decreasing the improper payment rate. For Rhode Island, the biggest impact to this is related to work search. We have a plan which has been outlined in both the workbook and IAP. We will focus on ongoing discussions related to how we can modernize our work search policy, provide consistent work search requirement messages to all customers through our interactions with staff in both the unemployment and reemployment offices, as well as reinstating work search attestations and reminder information during the online claim filing process.

*Overpayments*

*Detection*

*Recovery*

*Data Validation*

*Benefits*

We unfortunately continue to be on a CAP related to several populations and MODS for benefits data validation. As outlined in the workbook, we will begin the validation process during the fourth quarter of 2023. Populations that we fail will be assessed to determine if the failure is the result of a programming or procedural issue. We will then schedule group discussions between the validation, benefits, and IT staff to implement solutions.

*Tax*

Rhode Island has now passed populations 2 and 5.

At this time, we are only failing population 4. This is the most complex for Rhode Island. We have been working on multiple IT projects over the years which have taken the necessary resources needed to complete the data validation project. We plan to dedicate an IT resource and TPS supervisor to this population so that we can determine where the issues are within the program and ensure we address a plan for passing.

1. *BAM*

Through the year ending June 2022, BAM continued to experience staffing deficit and employee turnover. We have been successful in adding an additional FTE, increasing the unit’s staff from 5 employees to 6. We are in the process of hiring these staff. We anticipate that the unit will be up and running with 6 employees by November 2023. Unfortunately, the new staff will need several months of training and experience before they are able to be assigned a full caseload. While the performance workbook indicates that we have added additional CAPs during the year ending June 2022 we are unsure if the changes made now will see any changes for the upcoming performance year. We are hopeful that the Annual Determination letter that is issued for the year ending June 2024 will see some additional improvements.

1. ***Coordination with other plans, including WIOA***

The Department remains committed to providing reemployment services to UI claimants. RI’s Unemployment Insurance and Workforce Development divisions work closely to offer programs that will help job seekers find employment or underemployed workers to find better employment. These programs include WIOA Title I (Adult/Dislocated Worker), WIOA Title III (Wagner-Peyser), Senior Community Service Employment Program (SCSEP), Jobs for Veterans State Grants, National Health Emergency Grants, National Dislocated Worker Grants, Trade Adjustment Assistance, Multiple Apprenticeship Grants, and special services projects through the general revenue allocation (Reentry work, IDD populations, etc.).

In addition, the UI division works closely with both Workforce Development and the America’s Job Centers (AJC) operators to provide meaningful guidance to individuals seeking assistance with unemployment insurance benefits. Positions in the AJC’s filled under Wagner-Peyser, Trade and WIOA are often filled by individuals who previously worked in the UI Call Center. These individuals possess the necessary knowledge in regard to UI laws, processes and procedures and can assist claimants applying for UI benefits.

1. ***Tiger Team Grant Funds***

RI is participating in the Tiger Team engagement and has been awarded the recently modified grant amount available under UIPL 11-23. We have already conducted our state assessment but must complete our full project plan. We plan to work with our regional FPO throughout this process.

In Rhode Island, we have made timeliness and backlog reduction a topic of daily conversation. All units within the organization are aware of the importance of these issues. With a high backlog in adjudication and appeals, ensuring a timely delivery of benefit payments is not possible. We have created internal reports and know on a weekly and sometimes daily basis what our backlogs and timeliness scores are. This has helped us identify areas of lagging performance and gives us the opportunity to take corrective action. As a result, the appeals backlog has improved significantly, and the unit is maintaining performance in this area. However, despite the awareness in scores and backlog for adjudication, implementing a solution to correct the issue is not always possible. This is particularly true when staffing levels are low and nonmonetary issues are peaking. To try and correct this, we recently hired 4 new staff and are focusing on automation efforts to assist us in reducing some workload constraints.

Rhode Island has been actively focused on this area. We applied for and received funds under the equity grant. Through this we have been able to assist Spanish speaking customers more frequently and with a faster turnaround time. Additionally, we have been able to create a community-based organization referral process. Here we are available to those organizations who represent LEP customers and work together to ensure meaningful assistance and access to the UI program. We have successfully implemented a language field in the claims processing system. This assists our call center representatives with language assistance need identification. With access to this information the staff can quickly connect the call to an interpreter. We are working towards programming a similar field in the application available to customers so that they can self-identify language assistance. Finally, we are prioritizing translation of our UI documents into Spanish. We are making progress in all these areas.

1. **Federal emphasis (GPRA goals)**
2. ***State performance compared to the GPRA goals.*** 
   1. *Percent of Intrastate First Payments Made Timely*

**FY 2024 Target:** 87.0 percent of intrastate first payments for full weeks of UC will be made within 14/21 days from the week ending date of the first compensable week.

Rhode Island has continued to meet the recommended 87.0%. For the 12 months ending March 31, 2023, Rhode Island’s first payment timeliness rate is 87.95%

* 1. *Detection of Recoverable Overpayments*

**FY 2024 Target:** Overpayments established at a rate that is at least 57.5 percent of the estimated detectable, recoverable overpayments.

For the BAM estimates between October 1, 2021, through September 30, 2022, and the BPC data between April 1, 2022, through March 31, 2023, Rhode Island’s established 24.52% of estimated overpayments, below the 57.5% target.

Although this still does not pass, this is a significant increase in last year’s performance of 7.89%. We will incorporate the strategies outlined in the CAP workbook so that we can reach the GPRA and Integrity Measure related to detection of recoverable overpayments.

* 1. *Percent of Employer Tax Liability Determinations Made Timely* (*Establish Tax Accounts Promptly)*

**FY 2024 Target:** 90.0 percent of status determinations for new employers will be made     within 90 days of the end of the first quarter in which liability occurred.

1. ***Actions planned to reach or exceed the GPRA goals and targets.***

* 1. *Intrastate First Payments Made Timely*

As stated earlier, Rhode Island has been able to maintain acceptable performance in the area of timely first payment. Management focuses effort on monitoring first payment timeliness. Weekly reports are run and any issues with performance are investigated for potential solutions and training needs. We anticipate that the efforts we have put in place over the last several years and the continued focus on this performance measure will result in continued performance achievement.

* 1. *Detection of Recoverable Overpayments*

As indicated above, we plan to follow the milestones and action steps that have been written in our CAP workbook. In addition to enhancing staff training related to benefit year earnings we will continue to dedicate and increase staff hours to the cross match and benefit payment control functions whenever available. We will also be working on a plan to better handle our employer separation forms so that we can increase detections in this area as well. Finally, we are planning to publish our updated overpayment policy in the next few months which should assist us in being able to post some outstanding overpayments which will result in additional detections reported on the ETA 227 report. We are hoping these efforts will better align our overpayment detection with that of the BAM unit.

* 1. *Employer Tax Liability Determinations Made Timely*

The most recent TPS review determined that Rhode Island had established 93.26% of new accounts within 90 days of the liability date. We will continue to take all reasonable actions to ensure that every new Rhode Island employer is assigned a UI account number as soon as possible.

The Employer Tax Section website, used by employers to obtain information about Rhode Island UI, TDI, and JDF taxes, to register as an employer and obtain an employer registration number, and to file their UI Tax and Wage Reports via the internet, continued to operate successfully. Employers are encouraged to file online.  Continued modifications were made to the filing options which allowed the operation to become more user- friendly.

1. **Program Review Deficiencies**

***Program Review Deficiencies are not included in this narrative***

1. **Program Deficiencies**

***Rhode Island’s program reviews are not included in the narrative***

1. **Reporting Deficiencies** 
   1. ***Reporting Requirements***

Rhode Island has continued to struggle with timely submission of required reports. Regarding the AR8414, we have experienced an upload reporting issue due to a glitch in the computer system. We have been working with DOL to address this, but it has not been resolved yet. Regarding the AR8405, these reports were submitted late due to a combination of staffing deficit and misunderstanding of due dates. A revised policy and procedure have been implemented in the unit and training conducted. This is anticipated to correct the late reporting. Regarding the ETA586, the unit responsible for submitting this report experienced some delays in receiving the data due to a physical relocation of the unit. To correct any future issue, the unit is planning to confirm the production schedule with the IT staff and will contact them if there is any delay in receiving the report.

* 1. ***Invalid Detection Date***

The Department is mindful of the importance of selecting accurate detection dates for nonmonetary issues.  Adjudication management regularly meets with the adjudication staff to review cases, and any incorrect detection dates are brought to the adjudication staff’s attention and discussed.  Detection date selection will continue to be a topic presented quarterly at full adjudication staff meetings.  Adjudication staff who are identified as repeatedly selecting incorrect detection dates will have dedicated one-on-one meetings with management to review detection date selection in depth.  Adjudication management will continue to pull and evaluate adjudication cases to find detection date issues and to identify any training needs of the adjudication unit.

1. **Customer Service Surveys**

***Surveys are not included in the narrative***

1. **Trust Fund**
   1. ***Trust Fund Balance***

As of August 2023, the trust fund balance was approximately $500 million. We have been pleased to see the continued growth of the fund as we have recovered from the impacts of the pandemic.

* 1. ***Trust Fund Solvency***

Since legislation passed in 2012 to allow a better response in employer tax rates to variations in the fund usage and balance, issues maintaining healthy balances have been limited. Aside from the pandemic impacts, Rhode Island has seen very strong trust fund health. Additionally, we have seen substantial trust fund growth since the end of the pandemic.

1. **Assurances**
2. ***Assurance of Equal Opportunity (EO)***

In accordance with RIGL § 28-5.1, equal opportunity and affirmative action toward its achievement is the policy of all units of Rhode Island state government, including all public and quasi-public agencies, commissions, boards and authorities, and in the classified, unclassified, and non-classified services of State employment.  All policies, programs, and activities of state government shall be periodically reviewed and revised to assure their fidelity to this policy.

Each State agency has an Affirmative Action Plan publication that outlines numerous policies and practices instituted to ensure an equal opportunity/affirmative action environment. This Plan is available for review at the respective human resources office.

1. ***Assurance of Administrative Requirements and Allowable Cost Standards***

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all applicable federal and State statutes, regulations, formal polices, and/or established practices expressly complies with appropriate administrative requirements and allowable cost standards.

1. ***Assurance of Management Systems, Reporting, and Recordkeeping***

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all federal and State statutes, regulations, formal polices, and/or established practices expressly complies with proper management system, reporting, and recordkeeping procedures.

1. ***Assurance of Program Quality***

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all federal and State statutes, regulations, formal polices, and/or established practices expressly complies with proper program quality practices and procedures.

1. ***Assurance on Use of Unobligated Funds***

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all federal and State statutes, regulations, formal polices, and/or established practices expressly complies with proper practices and procedures related to use of unobligated funds.

1. ***Assurance of Prohibition of Lobbying Costs (29 CFR Part 93)***

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all federal and State statutes, regulations, formal polices, and/or established practices expressly complies with proper practices and procedures related to prohibition of lobbying costs.

Furthermore, the Hatch Act restricts Executive Branch employees in any agency of State government whose principal employment is in connection with an activity financed, in whole or in part by federal loans or grants from being a candidate in any partisan contested election.

Employees who are concerned that their political activities may be subject to the Hatch Act may obtain an advisory opinion from the United States Office of Special Counsel.

In addition, Rhode Island General Laws contain prohibitions on classified employees from seeking the nomination of or being a candidate for any elective State Office and also contain prohibitions on classified employees regarding running for partisan political office, campaigning for public officials during working hours and soliciting political contributions for or being solicited for political campaigns. Violations of these statutes can result in demotion or dismissal.

1. ***Drug-Free Workplace (29 CFR Part 98)***

The State of Rhode Island, in accordance with Executive Order 89-14 and the State’s Drug Free Workplace Policy, prohibits possession, use and distribution of illegal drugs in the workplace.  The only exceptions to this policy are those specified by RIGL § 21-28.6, known and cited as The Edward O. Hawkins and Thomas C. Slater Medical Marijuana Act.

In addition, each employee is required by law to inform the agency within five days after (s)he is convicted for violation of any federal or state criminal drug statute.  A conviction means a finding of guilt, a plea of guilty, regardless of the imposition of any sentence.  Employees who violate this Drug Free Workplace Policy will be subject to disciplinary action

The State encourages any employee with a drug abuse problem to seek assistance from the Care24 Employee Assistance Program.  For further information and details, see the State’s Drug Free Workplace Policy available at http://www.hr.ri.gov.

The agency has a Continuity of Operations (COOP) plan for operations while the Department of Information Technology (DoIT) has a Disaster Recovery (DR) plan for systems.  While the plans are separate, they are not mutually exclusive.  As such, the agencies continue to work to integrate the two plans to ensure seamless operation. The agency COOP plan is distributed to management electronically via email whenever the plan changes. It is reviewed annually and updated at least every three years in accordance with agency policy. The COOP plan goes into detail outlining the procedures that are in place in the event of a natural disaster, pandemic or other emergency in order to continue to provide essential income support services to RI workers and to operate its Income Support Division which includes Unemployment Insurance. The plan provides an emergency organization structure and communications network.  While this plan provides a blueprint for actions that will allow the Department to maintain its essential services during an emergency situation, it is to be considered a work in progress that will be updated and amended as situations arise and dictate.

The Department of Information Technology has conducted tests of the Disaster Recovery plan.  The last test was conducted from March 26 to March 28, 2018.  The DR test was successful with the Unemployment Benefits system being fully loaded onto machines at the designated DR site. Now that new contract has been established with SunGard in New Jersey, the disaster recovery coordinator is working with SunGard to schedule Disaster Recovery. Additionally, DLT is working on tabletop exercises that will meet IRS requirements for Business Continuity for multiple scenarios.

*Enterprise Technology Strategy and Services Policy 10-28 Contingency Planning*

Last published 11/8/2022 – revised and approved by Chief Information Security Officer, Brian Tardiff.

Purpose:  Establish policy for effective contingency planning that enables the restoration and continuity of operations of mission-critical assets and business functions.

*Enterprise Technology Strategy and Services Policy 10-12 Incident Handling and Response*

Last published: 11/8/2022 Policy is reviewed annually.

Purpose: Establish policy for the effective and timely management of IT security related incidents to safeguard State of Rhode Island IT resources, infrastructure, and data. Maintain an effective incident response capability that identifies early recognition of events and security incidents, mitigates loss, and restores IT services and network resources in a timely manner.

1. ***Assurance of Conformity and Compliance***

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all federal and State statutes, regulations, formal polices, and/or established practices expressly complies with proper practices and procedures related to conformity and compliance.

1. ***Assurance of Automated Information Systems Security.***

DLT follows the DoIT policies and procedures:

ETSS Policy 10-29 System and Information Integrity

Last revised 11/8/2022 Policy is reviewed annually

Purpose:  Establish policy for effective system and information security controls to safeguard State of RI information systems resources, infrastructure, and data.

1. ***Assurance of Confidentiality***

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all federal and State statutes, regulations, formal polices, and/or established practices expressly complies with proper practices and procedures related to confidentiality.

1. ***Assurance of Disaster Unemployment Assistance***

Rhode Island has been unable to conduct DUA training as anticipated. We will work on a plan in the upcoming months that will dedicate a lead administrator to this effort. We plan to utilize the NASWA training referenced in TEN 13-21.

Additionally, Rhode Island is still developing it’s DUA Standard Operating Procedures Manual and has requested technical assistance from USDOL to help in the process.

* Conducted Annual DUA training for DUA staff

YES       ☐

Click or tap to enter a date.

  NO        ☒

* Developed and/or maintained a Standard Operating Procedure for use during a major disaster declaration

YES       ☐

     NO         ☒

##### 4. Corrective Action Plans (CAPs)

CAPs are expected as a part of the SQSP when State’s annual performance does not meet the established criteria for core measures, Secretary’s Standards, UI program, assurances, and other program deficiencies identified in the annual SQSP guidance provided by the Department. The CAP must list both specific milestones for key corrective actions or improvement activities, and the completion date for each milestone.

**Nonmonetary Determination Timeliness**

**A. The Reason for the deficiency.**

The lack of timeliness during the period in question was due to a few reasons.  1) Cases were coming to the Central Adjudication Unit (CAU) already late before the scheduled adjudication appointment date. These cases arrived late in CAU during the pandemic due to the Department's inability to review employer separation forms for potential issues due to staffing levels.  2) Timeliness issues also stemmed from claim internet applications being processed untimely, again due to staffing levels.  3) More recently, beginning in November 2021, an ACLU lawsuit has required our scheduled adjudication appointments to provide ten (10) days advance notice. This impacts timeliness when our caseload is heavy as it will sometimes lead to cases being scheduled fourteen (14) or fifteen (15) days out, thus making timely adjudication decisions even more difficult.

Our timeliness issue is no longer related to the untimely processing of internet applications. Our timeliness struggle continues mainly due to the number days out that we are currrently scheduling our CAU appts. With the shortage of staff (that are already being assigned a max case load) and the influx of 80-100 RESEA appts being scheduled each week, our scheduler has been pushed out to anywhere from 17-20 days, which makes for an extremely challenging environment to meet the timeliness requirement. We also had a period of time where our Workforce system was down and CAU was inundated with even more RESEA cases than usual in an attempt to catch up. Our goals are to try to reduce our days out while also trying to reduce the number of RESEA cases from our scheduler.

**B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance.  Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc.   Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.**

Our plan of action to improve our timeliness:  1) Daily, front line adjudication managers will continue to distribute cases that are due to each adjudicator for prioritization and resolution by the due date of the case.  2) Review the daily report "Decisions Rendered Greater Than 21 Days After Detection Date" that identifies cases that were rendered late but were within the adjudicator's control to render timely.  Determine why the decision was rendered late (deadlines not adhered to, backlog management issue, not properly controlling interviews, statements taking too long due to unnecessary information being obtained, timeliness appeared to be within the adjudicator's control, but they had less than forty-eight (48) hours to complete the case, etc.).  Discuss timeliness remedies during one-on-one meetings with individual adjudicators that are struggling with timeliness.  3) Review the daily report "Decisions Already Late Before Scheduled Adjudication Appointment Date" that identifies the cases that were already late before the adjudication appointment date.  Determine why the case was late prior to the appointment date and meet with the Chief of UI Operations and Principal Manager to establish reasons for late cases and discuss solutions to eliminate the problem.  4) The CAU Management team will review the weekly timeliness report and continue to provide adjudicators with their timeliness scores for cases within their control and cases outside their control.  This allows adjudicators to know if their timeliness scores are meeting the required standard and for those adjudicators who may be struggling an opportunity to track their progress.

All of the action plan items above will remain in place for the upcoming year. We believe distributing "due date" sheets on a daily basis, sticking to 48 deadlines, providing timeliness feedback to our adj staff and discussing remedies one-on-one will be successful if management can create an environment for the staff to be successful. If we can reduce our number of days out and eliminate the RESEA cases from our scheduler we will meet our timeliness goals. In order to increase our daily case load, the dept has hired 4 new adjudicators. Once these adjudicators have been trained and are being assigned a full case load, that will add 140-160 to our weekly assigned cases or 560-640 extra cases per month. Adding these cases to our scheduler, we anticipate will shorten our days out to a  more manageable number, giving the adjudication staff a better opportunity to meet our timeliness requirement.

**C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.**

N/A

As mentioned above, our initial plan for timeliness has not worked because of the number of days out we are scheduling and the numnber of RESEA appts being scheduled each week. In addtion to hiring new adj staff, the dept is also taking steps to auto deny claimants who fail to meet the RESEA requirements, as is being implemented by other states. While our IT dept will be developing this programing, our mgmt team is in the process of creating a work around whic would remove the majority of our RESEA appts from our scheduler and be rendered by the adj staff the week following the claimant's RESEA non-compliance. We are anticipating this will remove a significant number of RESEA cases from our scheduler and shorten our days out. We are also trying to create a plan to provide an option to claimants filing a telephone claim to receive a "sooner appt" if an adj issue needs to be addressed. In an attempt to increase the number of claimants that comply with our RESEA requirements, as of 9/10/23, all claimants selected for RESEA must answer "yes" on their weekly cert that they understand that they are required to particapte in the RESEA progam. We anticipate that this will increase our RESEA compliance percentage to further reduce the number of RESEA appts that have to be adjudicated.

**D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.**

CAU management team will meet with Call Center management and/or BAM management to review timeliness scores, discuss potential issues afffecting the timeliness scores, make suggestions, and brainstorm ways for improvement of the timeliness scores.

The CAU management team will continue to meet with CC and BAM mgmt team to discuss ideas to increase timeliness. The adjudication management team have also put together a "SWAT team" where cases that have a short window to be rendered timely are being assigned to our most efficient adjudicators.

NOTE: Enter an "X" in the box to the right if the desired improvements will not be accomplished by the end of the two consecutive fiscal years for which this plan is in effect.  Summarize, below, the major actions remaining to be taken in subsequent fiscal years and include a projected completion date as to when the performance goal will be achieved.

**Nonmonetary Determination Quality**

**A. The Reason for the deficiency.**

The Central Adjudication Unit (CAU) was impacted greatly by the COVID-19 pandemic.  Starting with the week ending 3/14/20, the caseload was manageable at 254 cases, and by July 2020 the caseload was over 1,000 pending cases with 1,134 at its peak.  In July 2020 the unit contained nineteen (19) adjudicators, in April 2021, sixteen (16) adjudicators, and by the beginning of September 2021, there were only twelve (12) adjudicators due to staff attrition.  At the end of September 2021, the unit was able to hire eight (8) new adjudicators.  These new staff were trained but were kept at a reduced caseload until they became more familiar with the position.  Some of the staff needed more training time than we actually could afford.  Currently, CAU has sixteen (16) adjudicators, and half of those adjudicators began in the unit after the pandemic had started.  The quality of the unit has been below standards due to the different programs and claims issues.  This caused confusion and was overwhelming for some of the staff.  With PUA and COVID behind us, we believe our quality training plan for separation and non-separation issues will be successful to achieve our goals.

Our BTQ results have shown some cases to be inadquate due to the adjudicator not obtaining all relevant and critical information to render decision properly. Our plan is to look at each adjudicator individually to identitfy and assess why some adjudicators are still not meeting our quality standards. The CAU mgmt team will bring all failed BTQ cases back to the individual adjudicators for review to determine the shortcomings of each failed case.

**B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance.  Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc.   Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.**

Our plan of action to improve our quality:  1) The CAU management team will meet together weekly to review adjudication cases that are ready to be completed and score the case using a BTQ format. Any case that scores below 95 is returned to the adjudicator to make the necessary corrections required to score 100 before the decision is mailed. This will proactively help improve our quality through reviewing cases that would have failed BTQ before they are mailed instead of reviewing cases that have already been completed. We will also document these case results on a spreadsheet and track the progress of each individual adjudicator.  2) The adjudicators will perform a mock peer review by scoring their own cases in a BTQ format. The cases being selected for the adjudicator to review will be their own cases from a recent BTQ quarterly review. This will help adjudicators understand where their cases are lacking quality and how to improve them.  3) The CAU management team will review the weekly BAM “denied cases” to determine the quality of those cases to locate current trends with the adjudication decisions. This will help assess whether a problem is confined to a single adjudicator requiring one-on-one training or multiple adjudicators which would require a group training.  These cases, as well as the quarterly BTQ cases, will be included on the quality spreadsheet to track progress.  4) Hold bi-weekly CAU staff meeting/trainings with a strong emphasis on improving the quality of our adjudication decisions. Discussions will center around case reviews, obtaining relevant and critical information required for the case, having a better understanding of laws, policies and procedures, and critical thinking.

Each item in our plan of action above will remain in place. We will continue our CMP meetings and review claims proactively, identify the claims that are inadequate and require the adjudicators to make corrections before the cases are mailed out. The CAU management team will also develop a training plan to focus on case quality and identitfy the trends that are making our cases fail.

**C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.**

N/A

CAU has recently hired 4 new adjudicators as the unit had been short staffed for quite some time. Some of our adjudicators had felt overwhelmed with our caseload and combined with our timeliness issues, we believe some of our staff were rushing and not taking statements and completing cases the way they had been trained. With our new adjudicators coming on board and our plan to help our timeliness issues going in place, along with a new quality training plan, we believe this will help improve the quality of our cases.

**D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.**

Meetings will be held with CAU management team and BAM management to review cases that pass or fail, and to identify potential subjects for staff training.

We will continue to work with our BAM manager to evaluate adjudication decisions. We will use our action memos from our BAM manager and BTQ evaluations to help us develop our new quality training plans and identify which adjudicators continue to struggle.

NOTE: Enter an "X" in the box to the right if the desired improvements will not be accomplished by the end of the two consecutive fiscal years for which this plan is in effect.  Summarize, below, the major actions remaining to be taken in subsequent fiscal years and include a projected completion date as to when the performance goal will be achieved.

**Lower Authority Appeals Promptness**

**A. The Reason for the deficiency.**

Rhode Island has been on a Corrective Action Plan since 2020. In August 2019, prior to the pandemic, we had a reduction/layoff in our Referee staff. This left us unprepared when the global pandic hit in 2020. We initially hired three part-time contract Referees/Attorneys to assist with our case load. We were then able to hire two additional Referees. Once the caseload increased due to PUA and PEUC cases and, we were not able to keep up with the backlog even with the additonal staff. We were receiving approximately 120 appeals a week and we were only able to dispose of that same number weekly, which allowed our backlog to grow. When the PUA and PEUC caseload began to decline in late 2021, we were then hit with in excess of three A7hundred appeals from healthcare workers were had chosen not to comply with the State's vaccine mandate. At that time two of our contract referees/attorneys were no longer working with us leaving us with only one contract worker to assist with these cases. Our performance continued to drop as our backlog increased. We also continued to have issues with appeals not being transmitted timely by the Department.  On 2/28/22 we were able to hire another full-time Referee. By May 2022, we had completed the vaccine appeals. The number of appeals, transmitted to us by the Department, then started to drop and timely transmittal improved. As the backlog decreased the chief referee was able to closely monitor reports for case aging and add appeals to the schedule to be completed within the 30 or 45 day period. We are now seeing an improvement in our performance. The backlog of Lower Level appeals went from approximatley 700 as of April 2021 to approximately 230 as of September 2022. For the period ending July 31,  2022, only 8.2% of appeals were within 30 days and 73.1 in 45 days. As of August 31, 2022, that increased to  37.1 % of appeals completed within 30 days and 90.2% within 45 days. The Average Age of Lower Authority Appeals has also improved and is now meeting performance levels. For the period ending 7/31/22 the Average Age was 18.5 and for the period ending 8/31/22 it was 15.3. We believe we have resolved our performance issues for the Average Age of Lower Authority Appeals and the 80% of appeals completed within 45 days. We may only require another quarter and will then be meeting the measure of 60% of appeals completed within 30 days. As of 9/29/22 we have no appeals on our case aging report for 26-40 days and only one appeal on our 41-90 day aging report. That appeal had been postponed and will be completed on 9/30/22. All other pending appeals are on our 0-25 days Case Aging Detail Report.

Rhode Island has been on a Corrective Action Plan since 2020. In August 2019, prior to the pandemic, we had a reduction/layoff in our Referee staff. This left us unprepared when the global pandic hit in 2020. We initially hired three part-time contract Referees/Attorneys to assist with our case load. We were then able to hire two additional Referees. Once the caseload increased due to PUA and PEUC cases and, we were not able to keep up with the backlog even with the additonal staff. We were receiving approximately 120 appeals a week and we were only able to dispose of that same number weekly, which allowed our backlog to grow. When the PUA and PEUC caseload began to decline in late 2021, we were then hit with in excess of three hundred appeals from healthcare workers were had chosen not to comply with the State's vaccine mandate. At that time two of our contract referees/attorneys were no longer working with us leaving us with only one contract worker to assist with these cases. Our performance continued to drop as our backlog increased. We also continued to have issues with appeals not being transmitted timely by the Department.  On 2/28/22 we were able to hire another full-time Referee. By May 2022, we had completed the vaccine appeals. The number of appeals, transmitted to us by the Department, then started to drop and timely transmittal improved. As the backlog decreased the chief referee was able to closely monitor reports for case aging and add appeals to the schedule to be completed within the 30 or 45 day period. We are now seeing an improvement in our performance. The backlog of Lower Level appeals has continued to drop since May 2022.  This has allowed the Board to work towards meeting performance levels. While we were close to the required measures for quarter ending 3/31/23, 58.51 30 days and 76.42 45 days, as of quarter ending 6/30/23, 82.6% of appeals were completed in 30 days and 96.5% within 45 days. Rhode Island has closely followed our plan and made ever effort to improve our performance.

**B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance.  Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc.   Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.**

Rhode Island has taken action during this quarter, 3rd 2022, to improve performance. We immediately reacted to the drop in the appeals workload and added cases and worked with staff for timely completion.  Rhode Island has a close and collaborative working relationship with Department and the Central Adjudication Unit. This has assisted us in determining workflow and resolving issues of transmittal of appeals. Appeals are now transmitted within days of being filed with the Department. We then began to closely review and monitor our Case Aging reports and reports from USDOL. Our plan to meet performance measures and, sustain that improvement,  encompasses our three deficient  performance measures; 60% of appeals within 30 Days, 80% within 45 Days and Average Case Age of 30 Days. Rhode Island does not require seperate milestones for the three performance measures.

Rhode Island closely montiors transmittal of appeals from the Department. We have ongoing dicussions with Department (CAU) manger regarding issues with mailed, Internet or faxed appeals being transmitted late. The chief referee, office manager and CAU manager have weekly discussions about the quality and timeliness of appeals. Close monitoring of case aging reports, scheduling,and staffing to ensure we are improving and meeting performance levels.

**C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.**

Rhode Island has been on a corrective action plan for Lower Level appeals since 2020. Our prior plan was not successful in improving our performance due to the continued high volume of appeals and staffing issues. Rhode Island was not prepared for the 300 plus appeals that were filed by health care workers who chose not to follow the State's vaccine mandate. These appeals were filed and heard between December 2021 and April 2022. Even adding cases to the schedule did not allow us to meet the required performance measures. We were not able to hire a full-time Referee, to assist with our backlog, until 2/28/22. We have now worked through this caseload, have the required staffing,  and are projecting dramatic improvements with our performance.

Rhode Island has been on a corrective action plan for Lower Level appeals since 2020. We believe our previous year plan was successful in having us improve performance measures. As of quarter ending 3/31/23,  58.51 percent of appeals were within 30 days and 76.42 within 45 days. This is a dramatic improvement for Rhode Island from the prior year where only 4.29% were within 30 days and 26.32 within 45 days. While we did not meet the required performance levels, we were very close for the first time since 2020. We have continued to closely monitor tranmittals of appeals, scheduling and case aging reports. By quarter ending 6/30/23, we were meeting the required measures. We may have a month where the increase in cases and staffing impact our performance but we are able to balance this impact with higer performance levels in other months.

**D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.**

The chief referee and office manager will continue to work closely with the Principal Manager of the Central Adjudication Unit to determine the number of appeals pending and that they are transmitted timely. Once received at the Board, we will closely monitor our case aging reports to ensure they are scheduled and completed timely. We will watch for  potential impacts from additional cases, postponement requests, and unexpected staffing issues.

The chief referee and office manager will receive a daily email from the Central Adjudication Unit (CAU) with the number of appeals being transmitted, date of the appeal, and number of appeals pending. We will continue to have weekly communication with the CAU manager when issues arise with an appeal being transmitted late or if an appeal case could have been resloved by CAU. The chief referee will continue to closely review case aging reports on a weekly basis. When appeal numbers increase, cases will be added to the schedule to maintain performance levels. The chief referee will continue monthly meetings and training with the referees to discuss ways to improve and maintain performance levels.

**Improper Payments Measure**

**A. The Reason for the deficiency.**

The root causes for improper payments during year ending 6/30/21, were identity theft, benefit year earnings issues and separation issues.  Several units within the Department have been shortstaffed throughout the pandemic. This includes the BPC Unit and the Call Center. Without proper staffing in the BPC Unit, the department was left unable to address the majority of unreported beneft year earnngs issues on claims. Without proper staffing in the Call Center, employer wage forms were not being addressed timely, causing separation issues to go undetected. Additionally, fraudsters took advantage of the generous benefit programs available and lack of staff available to monitor these programs to the fullest extent.

During PIIA 2022 our top three root causes remained the same.

**B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance.  Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc.   Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.**

With the implementation of LEXIS NEXIS, VERUS and the new UI online (UIO) for filing internet claims, the department has been able to significantly reduce identity theft issues. In quarter ending 12/31/22, we will have staff who have received specific training on identity theft, working on claims that have been flagged with fraud codes. We will also have 2 staff members reviewing employer sides forms 2 times per week. This will help reduce improper payments caused by separation issues. The BAM Manager will meet with the BPC manager twice monthly to advise of trends spotted with benefit year earnings issues. Lastly, the department is actively working on a revised work search policy which we hope will be completed by quarter ending 12/31/22.

We continue to utilize ID theft prevention methods. In addition to the methods already described in last year's update, the Department has also conducted refresher trainig for call center staff with emphasis on detecting possible benefit year earning issues at the time of both the inital claim filing and refiles. This should have a postivie impact on lowering the percentage of improper payments.

**C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.**

The plan has been successful in many areas. Benefit Year earnings issues, other issues and separation issues have all been reduced. However, with the work search requirement being reintroduced effective 5/29/21, there has been an increase in improper payments resulting from not compliance with the work search policy. Because of this, the department is actively working on improving the policy.

Again, as stated in the IAP and milestones below, the work search policy has not been updated. We are discussing reinstating work search reminders and attestation in the claim application itself. We are hopeful this will result in fewer improper payments.

**D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.**

The BAM Manager will review error rates reports on a weekly basis and notify administration of any negative trends during bi-weekly status meetings.

The Bam, Overpayment, and Call Center Operations management will continue to meet to review errors and oversight that has lead to ongoing improper payments. These meetings will result in topics for retraining and identifying staff who need some additional feedback and assistance.

**Detection of Overpayments**

**A. The Reason for the deficiency.**

During the start of the pandemic staffing levels in the Benefit Payment Control Unit fluctuated. Along with having all staff work duties be shifted and focused on call center claims filing and payment functions. The Benefit Payment Control had minimal staffing. As PUA/PEUC came to a close, staff in the unit were shifted back to focusing on their benefit payment control tasks. Training then began for new staff, which were not yet up to full case load capacity. Limited staffing levels also impacted benefit wage document review. Additionally, adjudication staffing levels to address separation issues were impacted during this time. Finally, the Department's policy on determining recoverable versus non recoverable overpayments has been under review. Therefore, we are backlogged with posting overpayments on our system which has impacted the percent of detected overpayments. Upon implementation of the finalized policy, these figures will be restored to appropriate levels.

The reason for the deficiency remains the same.

**B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance.  Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc.   Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.**

We will work towards increasing the number of cases being assigned to each adjudicator. Also, we are exploring ways to incentivize the employer's response rate. We are currently working on a work flow plan in the Benefit Payment Control unit which includes rearranging work flow priorities. We are also working on a plan for crossmatch staff to allocate addtional work time to reviewing and scheduling cases. We will work to address the backlog of our unposted overpayments.

The Overpayment unit previously had staff out on medical and staff still in training on a reduced caseload. At this time, training has been completed and staff are now on a full case load, and minmual time out on medical. This will have a postive impact on the timeliness of detecting overpayments and increase the number of cases being adjudicated and rendered.                                                                             

**C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.**

Although we were able to hire staff in the benefit payment control unit, during the pandemic, the main focus of the Department remained on claim filing, benefit payments and combating fraud. Limited technical resources caused us to be unable to update our wage request form in our prior year's plan.

At this time, the Department has not yet hired any addtional staff due to limited resources.

**D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.**

Hold bi-weekly meetings with adjudicators to review questions, concerns, challenges and review work productivity. Weekly review of cases of newer adjudicators to ensure accuracy. Addtionally, we will monitor our scores each quarter and identiy any additional action that may be needed.

The overpayment managers continue to contuct bi-weekly meetings with adjudcators and have implemented "TRAINING TIP" for staff , that include additional usual information tools when investigating cases, and reminders of "things to remember" during the investigation and rendering process.

**Overpayments Recovery**

**A. The Reason for the deficiency.**

At the start of Pandemeic  and with the implementation of the Cares Act benefit programs, leadership enacted changes to two overpayment recovery processes. In an effort to better assist claimants that had their employment status affected by Covid and needng unemployment benefits, leadership first  amended the percentage rate of the voucher offset recovery tool from 100% to only 25%. The Second overpayment recovery process to be amended was the offset recovery  of state and Federal tax returns on specific overpayments. While the Department continues of offset Federal Income tax returns, the State Tax return offset has been suspended.

The reason for the deficiency remains the same.                                                                                      

**B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance.  Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc.   Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.**

The Department will review the current policy of the 25% voucher offset, and the current suspension of of the State Income tax recovery process and present a recommendation to leadership.

While leadership has remained committed to not chaning the policy decisions, we are going to schedule a time to discuss this in hopes that we can reverse these decisions. In addition we are working on updating the monthly bill and have modified our voice mail message to encourage repayment of overpayments.

**C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.**

N/A

The plan was unsuccessful because of our inability to reverse the policy decisions. We hope revisiting this will result in a different outcome.

**D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.**

Once decisions are made regarding the current policies, we will monitor if the recovery measure is increasing due to changes made.

We will monitor the results from the voice mail change and determine if more claimants are paying their overpayments by money order or check. We will also evaluate any incresae the updated monthly bill has on repayment.

**Benefits Data Validation**

**A. The Reason for the deficiency.**

LMI will review the results of any failed populations to determine if the failure is the result of programming or procedures.

The reason for the deficiency is due to limited staff.

**B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance.  Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc.   Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.**

LMI will discuss any faillures that appeaar to be the reuslt of state procedures with Benfits staff and any failures that apper to be the reuslts of programming with  IT and Benefit staffs.  The goal will be to discuss failues as soon after the population was validated as possible.

The results of any failed populations will be assessed to determine if the failure is the result of programming or procedure. LMI will discuss any faillures that appeaar to be the reuslt of state procedures with Benfits staff and any failures that apper to be the reuslts of programming with  IT and Benefit staffs.  The goal will be to discuss failues as soon after the population was validated as possible.

**C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.**

Limited IT and staff resources devoted to these populations while paying pandemic realted benefits remained top priority.

We have been able to hire a position in the LMI unit. We are hopeful this will free up staff availability to complete these validations.

**D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.**

We will meet and review findings to determine if changes are having success.

We will meet and review findings to determine if changes are having success.

**Tax Data Validation**

**A. The Reason for the deficiency.**

"Populations 2 and 5 failed because the 581 and DV job ran a day apart due to an operator error in our computer room.  These jobs are supposed to run on the same day so, that there are no discrepancies in the data.  This did not have a large affect but just enough that caused RI to have a greater than 2% variance in these populations.  RI has also learned its lesson not to wait till the last quarter to do the review.  If we had run the data validation check each quarter, we would have been able to pass these two populations.

The DV Tax Population 4 is currently failing.  This population is the most complex of all the populations to program for RI.  Per recommendations from mathematic Population 4 should be reprogrammed because it is too complex.  IT & SME resources availability has been limited due to higher priority demands.   RI Employer Tax is currently working on a project called the Employer Tax Cash Application and Deposit Project. Rhode Island’s Employer Tax Unit currently has a multi-step process for receiving, organizing, processing, and depositing checks and quarterly documents. This project would implement an Advanced Capture solution that reduces the steps involved in classifying the various workflows for the TX-17 with/without checks so that extraction rules can be applied for taxpayer and return information. Additionally, the application will present validation operators with unconfident classification and separation results to be confirmed or corrected.  This application will also create the Image Cash Letter (ICL) or Check 21 that will be generated by the KTA system, placed in a secure location for transferring to Bank of America. This project consumes a lot of the time of RI Business SME’s and the IT Programmers that work on the data validation application and programming.

SME’s and IT resources have been allocated to the address the concerns in Benefits and Tax Systems affected by Imposter fraud Cases, increase volume in benefit charge adjustments, and verifying employer tax rates were not adversely affected.  This work should be decreasing in the quarters to come.  Resulting in more time to be allocated to work on DV in this upcoming year.

The DV Tax Population 4 is currently failing.  This population is the most complex of all the populations to program for RI.  RI has been working on multiple IT projects over the years that have not been sucessfully implemented that have limited the resources needed to complete the Data Validation Project.  The plan is that in 2024 is to allocate an IT Programmer and Tax SME  to Population 4 so that we can determine where the issues are withing the program so that we do not keep Failing this population.   The programmer and the SME need to review the current programming and the DV Requirments and see if the best avenue is to tweak the current program or start from scratch which was recommened by Mathmatica.  Once it has been determined how to move forward both the SME and Programmer will work together to create the program file, test the file, and review the current 581 Receivable file for accuracy.  This should enable RI to identify where the issue is within the programs and result in a passing Population 4.                                                                                                                          

**B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance.  Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc.   Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.**

The plan to have Population 2 and 5 passing DV is to make sure that the DV and 581 jobs run on the same day going forward.  This should alleviate the failure going forward.  The plan for Population 4 to Pass is within the next year IT resources will have more time to dedicate to DV.  RI Employer Tax currently has a SME that is available to work on this currently.  Once the IT resources become available RI can start working on this population in detail.  The Cash Application and Deposit Project should be complete by early 2023.   As a result, this should free up the IT resources to work on the Tax Data Validation Population 4 programing so that RI can determine why the 2% requirement in DV is not passing.

The plan for Population 4 to Pass is within the next year IT resources will have more time to dedicate to DV.  RI Employer Tax currently has a SME that is available to work on this currently.  Once the IT resources become available RI can start working on this population in detail.

**C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.**

In the previous plan we were unable to get Population 4 passed.   This was directly related to a lack of resoucres.  This year should be more sucessful in meeting our goal for multiple reasons.  First, we now have a dedicated SME who can work on DV.  Secondly, IT resources should be freeing up soon since our KTA system should be going live in the beginning of 2023 and the demand for IT resources to work on Benefits payments and fraud has slowly been decreasing.

In the previous plan we were unable to get Population 4 passed.   This was directly related to a lack of resoucres.  The plan is to dedicate time for both the IT resources and the Tax SME so they can work together to address and solve the issues within Population 4

**D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.**

RI will meet monthly with the DV SME to see what road blocks they are running into and help them remove those barriers so that we can get all DV Tax populations passed.

RI will meet monthly with the DV SME to see what road blocks they are running into and help them remove those barriers so that we can get all DV Tax populations passed.

**Benefit Accuracy Measurement (BAM)**

**A. The Reason for the deficiency.**

Due to the retirement of one staff member and one manager, as well as the transitions two staff members made to other units, the BAM was extremely short staffed in fiscal year ending 6/30/21. During  year ending 6/30/22, we have still been unable to maintain adequate staffing levels. Effective 8/29/21, one position was left vacant when a staff member became manager of the unit. The position was not filled until 2/28/22. Additionally, another staff member left the unit in December, 2021. This position was also not filled until 2/28/22. Once the unit was brought to a full staffing level, the new employees required extensive training and were unable to take a full caseload for several months. In addition, as changes to the SunSystem developed, a glitch occurred. As a result of this glitch, staff completed and coded many cases that could not be saved in a timely manner. Once the issue with the Sunsystem was addressed, the time consuming  coding process had to be repeated on each of these cases.

During year ending 6/30/22, the BAM unit continued to experience an extreme staffing deficit which had contributed to our failing additional areas in BAM. Three new staff members were hired towards the end of this period. None of the staff members had adjudication experience. Therefore, they had to be trained on both BAM and adjudication practices. These staff were all issued a reduced schedule, while remaining staff worked to clear the backlogs aquired during the pandemic. Of the remaining staff, only one was considered "seasoned". Due to these challenges, the backlogged cases could not always be completed in a timely manner and the sample size requirements could not be met. The BAM Manager, as well as administration, has planned a meeting to identify the issues which have caused the deficiency with our monetary comparison reports.

**B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance.  Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc.   Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.**

The BAM Unit will continue to  experience a staffing deficit as one employee will be leaving the unit effective 10/1/22. However, a request to fill this position has already been approved and we are expecting the vacany to be brief. Once the position is filled, the staff member will immediately begin taking cases that will be completed with the assistance of the unit manager. The staff member will then shadow other members of the unit before completing the training process.  Effectiveness will be measured by monitoring timliness and and sample size via the User Defined Timlapse Reports as well as Case Completion Reports.

Currently the BAM unit is still short staffed. However, three new positions were posted. An upgrade in the paygrade for these positions was implemented to attract more qualified candidates. Interviews for these three positions were conducted. Staff are being assigned work based on the national office's recommendation regarding time it should take for case completion. For this reason, we expect the number of cases to increase, but we do not expect the full sample size to be met during FYE 2023. We do expect timliness standards to be met in all categories and will work to train new hires so they are up to speed as quickly as possible. Part of this training will include introducing the new hires to a denied caseload as recommended by the national office.

**C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.**

Although a plan was in place, the staffing deficit, paired with the challenge of working with inexperienced staff, kept the unit from meeting sample size as well as timeliness requirements. Although the issue of a a deficit is not completely resolved, the deficit has decreased from 2 to 1. With the majority of staff now having a good working knowledge of the investigative process, we will be able to assign more cases to each staff member, and we will have seasoned staff help train our new hire once the interview process has concluded.

Although a plan was in place, there was still a staffing deficit and backlog of cases. This, paired with the challenge of working with inexperienced staff,  kept the unit from meeting sample size as well as timeliness requirements. Although the issue of a a deficit is not completely resolved, the specs of the position changed in order to attract candidates who already have the experience necessary to be successful in BAM. The unit no longer has a looming backlog, and will schedule cases at a reasonable rate in order to meet timliness standards. The unit will work with DV to correct the issues we identify with our comparisson reports.

**D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.**

Each staff member will meet with the BAM Manager on a bi-weekly basis to go over the areas where they are excelling, and areas they would like additional training in. Constructive criticism will also be provided during these meetings to address timeliness or quality concerns.

Each staff member will continue to meet with the BAM Manager on a bi-weekly basis to go over the areas where they are excelling, and areas they would like additional training in. Constructive criticism will also be provided during these meetings to address timeliness or quality concerns.  Data regarding effectiveness will be obtained  via the User Defined Timelapse Reports as well as Case Completion Reports. This data will be added to a spreadhseet to track productivity and quality of work.

##### 5. UI Program Integrity Action Plan (UI IAP)

The UI IAP outlines the strategies the State will undertake during the planning period regarding the prevention reduction and recovery of UI improper payments.

**State Quality Service Plan (SQSP)**

**Integrity Action Plan (IAP)**

*Rhode Island – Fiscal Year (FY) 2024*

**Accountable Agency Official(s).**

List the person or persons accountable for ensuring integrity in the state’s unemployment insurance (UI) program.

**Name:** Philip D’Ambra

**Title:** Director of Income Support

**Email:** [philip.l.dambra@dlt.ri.gov](mailto:philip.l.dambra@dlt.ri.gov)

**Phone:** 401-462-8405

**\*Note:** Unemployment Insurance Program Letter (UIPL) No. [09-23](https://www.dol.gov/agencies/eta/advisories/UIPL0923), issued on June 30, 2023, makes reference to UIPL No. 22-21, Change 2, throughout the guidance.  However, on July 13, 2023, the Employment and Training Administration (ETA) issued UIPL No. [10-23](https://www.dol.gov/agencies/eta/advisories/uipl-10-23), which rescinded UIPL No. 22-21, Change 2.  UIPL No. [11-23](https://www.dol.gov/agencies/eta/advisories/uipl-11-23), also issued on July 13, 2023, changed the amount of the integrity grant funding originally issued under UIPL No. 22-21, Change 2, but maintained the guidance on required and recommended fraud prevention and detection and overpayment recovery activities.

* **(Topic #1: National Priority) – Ensuring UI program integrity by assessing and evaluating fraud risks, implementing and maintaining sufficient controls to effectively mitigate the likelihood and impact of fraud, and reducing improper payments.**

*The state of Rhode Island received the integrity grant, and it will use it for the Lexis Nexis contract and for enhancement and modernizing of several fraud prevention tools. These improvements will help detect and prevent fraud along with in house solution and modifications.*

* In evaluating fraud risks, states should consider both eligibility fraud risks and identity (ID) fraud risks.

* **State plans to evaluate UI fraud risks and implement and maintain sufficient controls to effectively prevent fraud and reduce improper payments, including state actions to develop their own state-specific antifraud strategy.**

*We have been meeting regularly to determine the best method to address the ID verification process. Currently Rhode Island uses Lexis Nexis and Multi Factor Authentication along with a username and password sign on for online claim filing and weekly certifications. Once claims are filed we use various reports to identify possible ID theft issues. We believe we are flagging too many valid claimants and are working with our IT staff to streamline this process to better flag claims. We will also be working with Lexis Nexis, incorporating threat metrix to also assist in fraud prevention. Once our modifications are made, we will establish regular data check ins with the administrative team responsible for handling fraud. We will review our data and makesuggestions to change processes so that we can ensure we have not missed fraud flags and that we are limiting the burden on non-ID theft claimants.*

* + Key elements of an antifraud strategy include:
    - **Who** is responsible for fraud risk management activities?
      * Establish roles and responsibilities of those involved in fraud risk management activities, such as the antifraud entity and external parties responsible for fraud controls, and communicate the role of the Office of Inspector General (OIG) to investigate potential fraud.
    - **What** is the program doing to manage fraud risk?
      * Describe the program’s activities for preventing, detecting, and responding to fraud, as well as monitoring and evaluation.
    - **When** is the program implementing fraud risk management activities?
      * Create timelines for implementing fraud risk management activities, as appropriate, including monitoring and evaluations.
    - **Where** is the program focusing its fraud risk management activities?
      * Demonstrate links to the highest internal and external residual fraud risks outlined in the fraud risk profile.
    - **Why** is fraud risk management important?
      * Communicate the antifraud strategy to employees and other stakeholders, and link antifraud efforts to other risk management activities, if any.
* *See* A Framework for Managing Fraud Risks in Federal Programs at <https://www.gao.gov/assets/gao-15-593sp.pdf> for additional information.

* **State use of tools, services, strategies, process improvements, and/or procedural changes adopted by the state to combat fraud, verify identities, and enhance recovery efforts.  States must identify which tools, solutions, and service provider(s) are used in the state’s fraud management operations, including but not limited, to the following areas: data analysis, risk-based ID verification, fraud prevention and detection, and cybersecurity.**

*As indicated above, we use Lexis Nexis, Multi Factor Authentication, and username and password for online claim applications and certifications. We work with the Rhode Island State Police to flag potentially fraudulent claims. We use the IDH and various internal reports.*

* + Include strategies, solutions, and/or activities using funds the Department has made available to states for combatting fraud and strengthening UI program integrity under UIPL Nos. [28-20](https://www.dol.gov/agencies/eta/advisories/unemployment-insurance-program-letter-no-28-20); [28-20, Change 1](https://www.dol.gov/agencies/eta/advisories/unemployment-insurance-program-letter-no-28-20-change-1); [28-20, Change 2](https://www.dol.gov/agencies/eta/advisories/unemployment-insurance-program-letter-no-28-20-change-2); [28-20, Change 4](https://www.dol.gov/agencies/eta/advisories/uipl-no-28-20-change-4); [22-21](https://www.dol.gov/agencies/eta/advisories/unemployment-insurance-program-letter-no-22-21); [11-23](https://www.dol.gov/agencies/eta/advisories/uipl-11-23); and [02-22](https://www.dol.gov/agencies/eta/advisories/unemployment-insurance-program-letter-no-02-22).
  + Provide details on overpayment recovery efforts including:
    - Actions with banks, financial institutions, and with Federal law enforcement’s forfeiture and seizure efforts**.**
    - Information on how the state is using waivers of recovery of overpayments both for regular UI and temporary UC programs created by the CARES Act, including if the state is using approved blanket waivers as described in UIPL No. [20-21, Change 1](https://www.dol.gov/agencies/eta/advisories/unemployment-insurance-program-letter-no-20-21-change-1).
    - How the state is using the Treasury Offset Program (TOP) for benefit overpayment recovery, how the state is ensuring covered debts are being submitted, and any barriers/challenges in working with TOP.

* **State use of UI Integrity Center resources, with a particular focus on state connection to the Integrity Data Hub (IDH) and use of its datasets to cross-match unemployment compensation (UC) claims and aid in the prevention and detection of fraud and improper payments (*see* Training and Employment Notice (TEN) No.** [24-21](https://www.dol.gov/agencies/eta/advisories/training-and-employment-notice-no-24-21)**);**

*The state submits all initial claims for IDH cross-matching and is fully leverage all available IDH capabilities. IDH capabilities include:*

*o Suspicious Actor Repository (SAR)*

*o Multi-State Cross-Match (MSCM)*

*o Identity Verification (IDV)*

*o Bank Account Verification (BAV)*

*o Fraud Alerting*

*o Foreign Internet Protocol (IP) Address Detection*

*o Suspicious Email Domains and Patterns*

*We have staff that are assigned daily to work on all functions listed above and are also creating SAR with fraudulent information that can be beneficial to other states across the nation.*

*The state had used the UI National Integrity Academy’s virtual trainings and/or eLearning lessons with Fraud investigators and Sr Employment and Training Interviewer.*

* + Discuss the state’s connection to the IDH, including frequency of IDH use.
    - Does the state submit all initial and continued claims for IDH cross-matching? If not, what is preventing the state from sending all claims?
  + If the state is not connected to the IDH and/or is connected but not regularly submitting UI claims data through a webservice/real-time connection to IDH, provide details on the state’s plan for how to increase usage and an anticipated timeline to:
    - Connect to the IDH.
    - Increase frequency of IDH use.
    - Fully leverage all available IDH capabilities.  IDH capabilities include:
      * Suspicious Actor Repository (SAR)
      * Multi-State Cross-Match (MSCM)
      * Identity Verification (IDV)
      * Bank Account Verification (BAV)
      * Fraud Alerting
      * Foreign Internet Protocol (IP) Address Detection
      * Suspicious Email Domains and Patterns
    - Update the IDH connection to a webservice/real-time connection.
    - Identify barriers to using any of the available IDH capabilities.
  + If the state has not executed IDH Participation Agreement - Version 5.0 (see TEN No. [24-21](https://www.dol.gov/agencies/eta/advisories/training-and-employment-notice-no-24-21)), provide details on the anticipated timeline to update to IDH Participation Agreement – Version 5.0.
  + Discuss the state’s use of the UI National Integrity Academy’s virtual trainings and/or eLearning lessons.
  + Discuss the state’s use of UI Integrity Knowledge Exchange Library resources, including the Behavioral Insights Toolkit (*see* TEN No. [15-21](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=6799)).
  + Discuss the state’s participation in State Consultative Services.

**Note:** The IDH Team has a one-page dashboard report for each state summarizing current IDH utilization and areas where IDH use might be expanded.  Please reach out to [IDHTeam@naswa.org](mailto:IDHTeam@naswa.org) to request a copy of your state’s IDH utilization dashboard report.

* **State use of required and recommended integrity controls and overpayment recovery activities as outlined in** [UIPL No. 11-23](https://www.dol.gov/agencies/eta/advisories/uipl-11-23)**, including any additional effective cross-matching and overpayment recovery activities and identified best practices.**

*The Department conducts several fraud prevention and detection activities as outlined in UIPL No. 11-23. These fraud prevention tools include systems such as, Lexis Nexis and Integrity Data Hub fraud prevention tools. The Department utilizes the National Directory of New Hires crossmatch to detect individuals who return to work during the continued claim but fail to report a return to work. A quarterly wage crossmatch to detect individuals who return work during prior completed quarters but fail to report a return to work.*

*In addition, any time a new claim is filed there are automated crossmatches in place with the Division of Motor Vehicles and Social Security Administration that verify claimant identity. We also utilize the Alien Verification for Entitlement (SAVE) System to ensure proper work authorization. All tools mentioned above work in conjunction with each other to prevent and detect fraudulent activity.*

*The Department utilizes various overpayment recovery methods, including, benefit offsets, state lottery winnings, Federal IRS offsets and mailed in checks or money orders. The Department also utilizes crossmatches to determine if an overpayment exists in another state. If an overpayment exists, the Department will intercept those benefits for the purpose of recovery.*

*The Department continues to face challenges with the recovery of overpayments. These challenges include the reduction in benefit offset from 50%-100% to 25%. This reduction was implemented during the Pandemic; however, discussions are taking place with leadership to increase the offset amount back to pre-pandemic levels. In addition, the Department suspended the State Income Tax offset during the Pandemic. Currently, we are discussing the reinstatement of this recovery method as well. We believe that the reinstatement of these two recovery methods will result in a significant increase to our overpayment recovery rate.*

*Lastly, the Department does not garnish wages, apply property liens, send overpayments for civil action, use collection agency referrals, nor report any overpayments to the credit bureaus. The Department is exploring these additional recovery methods legal and executive leadership teams.*

* + Provide details regarding the state’s use of each cross-match/integrity control and overpayment recovery activity (required and recommended) as outlined in [UIPL No. 11-23](https://www.dol.gov/agencies/eta/advisories/uipl-11-23).  Include details on the frequency of crossmatch/integrity controls use (*e.g.*, conducted on all initial claims, all continued claims, only when suspicious activity is identified?) and frequency of overpayment recovery activities.
  + Cross-matches/integrity controls and recovery activities include:

**Cross-matches/Integrity Controls**

* + - ID Verification;
    - National Directory of New Hires (NDNH);
    - Quarterly Wage Records Cross-match;
    - Systematic Alien Verification for Entitlement (SAVE);
    - Referral of allegations reasonably believed to constitute UC fraud, waste, abuse, mismanagement, or misconduct to DOL-OIG;
    - UI Integrity Center’s IDH;
    - Digital Authentication, such as Multifactor Authentication (MFA);
    - Device Fingerprint/Reputation Management;
    - Fraud Risk Scoring (*i.e.*, Case Management Prioritization);
    - Comparisons and that detect shared characteristics;
    - Social Security Administration (*i.e.*, Unemployment Insurance Query (UIQ), Prisoner Update Processing System (PUPS), Death Master File);
    - Federal, state, and local incarceration ;
    - Deceased Records cross-matches;
    - Vital Statistics cross-
    - State Directory of New Hires (SDNH);
    - Department of Motor Vehicle cross-
    - Interstate Benefits (IB) cross-match;
    - State Identification Inquiry (SID) and IB8606 enhancements made to the Interstate Connection (ICON) network cross-match to prevent concurrent claim filing in multiple states;
    - Use of a unique identifier to identify claimants instead of using the full
    - Fictitious employer cross-
    - Periodic IT security assessments and audits consistent with National Institute of Standards and Technology (NIST)-compliant information technology security guidelines;
    - Adequate internal controls to protect the integrity and security of state assets;
    - Implement a cross-functional integrity task force to develop and implement state-specific action plans to reduce UI improper payments.

**Overpayment Recovery Activities**

* + - Benefit Offsets;
    - TOP;
    - Cross Program Offset Recovery Agreement (CPORA);
    - Interstate Reciprocal Offset Recovery Arrangement (IPORA);
    - Negotiating repayment plans;
    - Accepting repayments through various methods (*e.g.*, online, via debit/credit card);
    - State Income Tax Offset Program;
    - Wage garnishments;
    - Property liens and assessments;
    - Offsets of lottery winnings, homestead exemptions, and other benefits;
    - Active participation in probate and/or bankruptcy proceedings;
    - Skip tracing;
    - Work proactively and collaboratively with banks and financial institutions;
    - Civil actions;
    - Credit bureau referrals;
    - State/federal prosecution;
    - Penalties and interest on overpayments in compliance with state and federal law;
    - Collection agency referrals;
    - Implementing a voluntary fraud self-disclosure program;
    - Other recovery methods as determined by state law or policy.
  + Identify any additional integrity controls or recovery activities the state uses that are not listed in [UIPL No. 11-23](https://www.dol.gov/agencies/eta/advisories/uipl-11-23).
  + Provide promising practices.
  + Identify challenges with cross-matches or in overpayment recovery activities.
  + If the state does not currently use one of the integrity controls or recovery activities listed in [UIPL No. 11-23](https://www.dol.gov/agencies/eta/advisories/uipl-11-23), provide the state’s plan and anticipated timeline to request and obtain access to the cross-match/integrity control or to implement the overpayment recovery activity.

**Note:** If the state does not plan to obtain access to a cross-match/integrity control or implement a specific recovery activity, please explain.

* **State use and employer participation in State Information Data Exchange System (SIDES) (*see* TEN No.** [12-16](https://www.dol.gov/agencies/eta/advisories/training-and-employment-notice-no-12-16)**).**

*Since our last IAP there have been no changes to the exchanges that Rhode Island uses in SIDES. We are interested in expanding SIDES usage but must balance this with the many other projects currently being worked on in Rhode Island. Generally, we are verifying separation information through SIDES when the employer has elected to participate. In an attempt to make the Rhode Island program more user friendly we have suggested some minor changes to employer form notification messages, PIN information, and turnaround time for updating employer requested changes.*

* + Provide details on the state’s current usage of SIDES.
  + If the state does not currently use all available SIDES exchanges, provide the state’s plan for how to connect to all SIDES exchanges and an anticipated timeline to implement each SIDES exchange.  Sides Exchanges include:
    - Separation Information
    - Monetary & Potential Charges
    - Additional Fact-Finding
    - Determinations & Decisions
    - Earnings Verification
    - Benefit Charges
  + Identify any barriers to SIDES exchange participation, either in state promotion or in employer adoption.

* **State strategies designed to facilitate claimants’ compliance with state work search requirements while also supporting their reemployment such as adoption of the work search requirements in the Model Work Search Legislation (*see* TEN No.** [17-19](https://www.dol.gov/agencies/eta/advisories/training-and-employment-notice-no-17-19)**).**

*Rhode Island requires nonexempt claimants to complete 3 work search contacts each week. A work search contact includes applying for a job, interviewing for a job, or attending a job fair. We’ve had interest in updating our regulation to better align with the model legislation. However, this has not been fully supported by our executive office. Unfortunately, the employer community would likely see modifications as additional leniency on claimant UC requirements. It has been a challenge to get claimants to comply with the work search. Prior to the Pandemic we included a work search reminder in our online claim application. As we updated our claim intake process, this reminder wasn’t included in the newer version of the application. We have flagged this as a concern and are requesting it be placed back in the application. We are hoping this gives claimants another reminder of the work search requirement. We still provide our requirement in mailings and will continue to do so.*

* + Outline the state’s work search requirement and explain state challenges with work search improper payments.
  + Discuss the state’s plan to improve work search compliance by reducing work search errors and strengthening reemployment.

* **(Topic #2) – State plans and actions to address the state's top three improper payment root causes in Payment Integrity Information Act (PIIA) 2022.**

*The state’s top three improper payment root causes for PIIA 2022 were work search, other eligibility, and benefit year earnings. In recent quarters, other eligibility is no longer one of the top 3 reasons. During the PIIA 2022 other eligibility were higher than preferred due to confusion over which benefit program type claimants were eligible for. This issue corrected itself as we stopped paying PUA, PEUC, and EB.*

*The state challenges in reducing benefit year earning improper payments are due to limited staffing levels and lack of institutional knowledge. During the pandemic, there was a large amount of employee turnover due to retirements and promotions. The remaining staff who would normally devote their efforts to crossmatch functions were assisting the call center with the influx in claims. This halted the detection and prevention of overpayments and caused a large backlog. As the number of claims being filed lessened, staff slowly began working on crossmatch functions on a limited basis when time allowed. Their time was split between reducing the acquired backlog and scheduling new issues to be addressed by Benefit Claims Specialists. The cases scheduled to be addressed were restricted while newly hired Benefit Claims Specialists were learning the functions of their jobs and working on a reduced schedule. Additionally, newly hired interviewers were being trained on multiple programs, and a strong emphasis was not placed on training these employees on the methods to detect underreported and unreported earnings.*

*Currently, staffing levels are still limited. However, one staff member is devoting full time efforts towards crossmatch while two additional staff members work on crossmatch on a part-time, consistent basis. All benefit claims specialists are now addressing a full caseload.  Interviewers recently underwent a group training on the detection and prevention of overpayments. Management created a spreadsheet to evaluate missteps that continue to take place, and this is used to give staff one-on-one feedback and to identify areas where training can be improved. Lastly, the department is proposing technological updates to help staff detect unreported earnings in an easier and more efficient fashion.*

*The state challenges in reducing work search issues are claimant’s lack of compliance with the requirement. A claimant might have conducted a work search but has not meet the required number of contacts in the key week. Additionally, the state has determined that more consistent messaging between the unemployment and reemployment offices will help claimants become aware of the required number and type of activities. We plan to add the work search reminder back to the online claim application. We are evaluating the idea of random work search audits. Finally, we will continue to attempt to modify the work search requirements, so they are more flexible to include reemployment activities rather than applications alone. This has not been supported by executive yet, but we will continue to suggest it as a possible solution.*

* + Identify the state’s top three improper payment root causes.
  + Explain the state’s challenges in reducing improper payments in the top three root cause categories.
  + Discuss the state’s plan to reduce improper payments in each root cause category.

* **(Topic #3) – State coordination and collaboration with the DOL-OIG and other state and Federal law enforcement agencies to investigate and prosecute UI fraud and recover overpayments.  This should also include state plans to continue providing all confidential UC information to DOL-OIG for purposes of both investigating fraud and performing audits.**

*The state will continue to coordinate and collaborate with DOL-OIG and other state law enforcement to investigate and prosecute UI fraud and recover overpayments. The state plans to continue to provide all UI confidential information to DOL-OIG for audit performances and fraud investigations.*

* **(Topic #4) – State plans to strengthen program integrity in UI tax operations, including current activities and plans to identify and prevent worker misclassification, State Unemployment Tax Act (SUTA) Dumping, and fictitious employer schemes, and development/use of effective employer audit strategies (*i.e.*, use of remote audits).**

*Rhode Island has made improvements to their audit program which will help identify and prevent worker misclassification. Employer Tax has updated their audit assignment report with an emphasis focusing on industries where worker misclassification is prevalent.  We have also begun the process of re-auditing employers, whose past audits, have resulted in successful identification of worker misclassification.*

*Rhode Island has also initiated the process to receive the IRS 1099 extract file which will be very helpful going forward.*

*Employer Tax is an active participant on the Joint Task Force on Underground Economy and Employee Misclassification, which began in 2015.  The employer tax unit (ET) has been working together with other members, very effectively and efficiently over the past year.  A workflow has been created to share information between member agencies including workers compensation, labor standards, UI benefits, and the contractor’s registration board to address employee misclassification. This communication has been very beneficial for Employer Tax being able to assign audits and identify misclassified workers in the workplace.*

*RI Employer Tax currently uses the SDDS software program to help identify SUTA Dumping.  The use of this software is very productive and has helped us identify situations where payroll has transferred from one entity to another.  This is extremely important when such transfers are not disclosed at time of registration.*

*RI has started to take a deep dive and investigate the uptick in registrations to detect and prevent fictitious employer schemes.  A fictitious employer scheme in UI involves creating a fake company for the purpose of fraudulently obtaining benefits.*

*This is typically accomplished by:*

*•Establishing a fake employer account*

*•Submitting quarterly wage reports for non-existent employees*

*•Making minimal or no tax payments, typically includes backdating liability*

*Many States have robust fictitious employer detection systems, as they are modernized.  Unfortunately, we are not modernized and have to perform this analysis manually. We have recently pulled data for the following scenarios:*

* *A database where all employers are listed if they had benefit payments charged to their account within the first 2 quarters of liability.*
* *All accounts where the registration has a backdated liability of greater than 60 days.*
* Identify current activities and plans to address:
  + Worker Misclassification
  + SUTA Dumping
  + Fictitious employer schemes
* Development/use of effective employer audit strategies (including, but not limited to, use of remote audits).

* **(Topic #5) – State plans and actions to strengthen internal security and ensure that all appropriate internal controls and processes are in place and are adequate to assess internal risks and threats, ensure program integrity, and minimize program vulnerabilities (*see* UIPL No.** [14-17](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=5496)**).**

*The state will continue to monitor internal security through various reports, conduct Annual Integrity Training with Staff and continue to ensure that internal controls are in place to minimize program vulnerability.*

* **(Topic #6) – State plans and actions to evaluate the effectiveness and equity of fraud prevention and detection, ID verification, and improper payment reduction activities.  State should include strategies to ensure that processes used to detect and prevent fraud are effective and do not limit the ability for a legitimate claimant to apply for and become eligible for UC.  States implementing or using facial recognition technology in their ID proofing processes must also report findings from bias testing and provide updates on efforts to mitigate biases or barriers in this section of the IAP.**

*The state is currently using several internal and external tools and strategies to ensure that claims are validated in a timeline manner. These tools are effective and do not limit the ability for a legitimate claimant to apply for and become eligible for a UI claim and get paid in a timely manner.*

* + Identify potential barriers that are created by fraud prevention and detection functions for legitimate claimants.  Provide plans and actions designed to mitigate such risks.
  + As required in [UIPL No. 11-23](https://www.dol.gov/agencies/eta/advisories/uipl-11-23), states must ensure there is at least one timely, effective, and accessible non-digital alternative to online ID verification, which should not be overly burdensome on applicants, limit access to public benefits programs or the timely receipt of benefits, or stigmatize members of the public in any way.  Provide details on the state’s non-digital ID verification option(s).
  + Include how the state flags cases for suspected fraudulent activity and how investigation resources are assigned, including:
    - What risk scoring elements and/or prioritization elements are used.
    - How the risk scoring elements and/or prioritization elements are weighted.
    - How the state evaluates the weights based on false positives and negatives.
    - How risk scoring elements and/or prioritization elements are updated.
    - How the state ensures the fraud risk scoring and/or prioritization of cases does not negatively affect legitimate claimants.
  + Include details on how the state measures claimants’ usage of both digital and non-digital identity verification options, how the state reviews digital services for false positive and false negatives, and how the state ensures legitimate claimants have alternative paths to prove their identity and/or resolve issues, including providing a possible recourse.

* **(Topic #7) – State plans and actions to mitigate negative consequences for victims of UI ID fraud, including ensuring simplified processes to remove the victim’s liability for overpayments resulting from ID fraud.**

*The state will continue to address fraudulent claims for victims of ID theft within a timely manner. We ensure that the real claimant does not experience any overpayment liability. If payments were made to a fraudster, we process a corrected 1099 so the real owner of the SSN is not held accountable. Detailed instructions are listed on our state website for victims of UI ID fraud and how to request action on this matter.*

* + Include details regarding how the state provides a reporting mechanism for UI ID fraud on their websites, communicates status updates for such investigations, and takes action to protect the victim when the state determines that UI ID fraud has occurred (*see*[UIPL No. 11-23](https://www.dol.gov/agencies/eta/advisories/uipl-11-23) for more details on protecting victims of ID fraud).
  + Include the state’s procedures for mitigating negative impacts on the UI ID fraud victim (*e.g.*, establishing a pseudo claim record, temporarily marking the overpayment as “uncollectible”, etc.).

* **(Topic #8) – If the state has not provided complete and accurate overpayment reporting on the ETA 227 reports (Overpayment Detection and Recovery Activities), and the ETA 902P report (Pandemic Unemployment Assistance Activities), the state must provide information on plans for improvement, including timeframes and milestones, for addressing the issue and ensuring complete, accurate, and timely reporting in FY 2024.**

*Regarding the ETA 227 report, the state is not accurately reporting FPUC for each underlying benefit program. We’ve requested a level of effort from our IT team, and this would require extensive work. We do not have the resources to focus on this now. An email to the regional office asking for next steps was sent in June 2023 but we are waiting on a response. In addition to the FPUC reporting issue, Rhode Island is not reporting ID theft overpayments on the 902P report. While Rhode Island has identified ID theft overpayments, decisions to declare the imposter overpaid have not been completed. Additionally, the overpaid dollars have not been entered into our overpayment system and therefore are not able to be reported on the 902P report. Again, in order to fix this, we need to prioritize IT work within the overpayment system. With our limited resources and competing priorities, this has still not been initiated.*

* If the state has submitted all data for the ETA 227 or 902P reports, this section is not applicable, and the state can input “N/A”.

##### 6. Organizational Chart

The organization chart must conform to the requirement for delivery of service through public employment offices, or such other designated providers as the Secretary may authorize; show the State's configuration from the Governor of the State down to the point of Employment Service and UI customer service delivery; and provide sufficient detail to show each organizational unit involved and the title of the unit manager.

The Organizational Chart is viewable at: <https://dlt.ri.gov/sites/g/files/xkgbur571/files/2024-01/UI%20Org%20Chart%20-%202024%20RI%20SQSP.pdf>

##### 7. SQSP Signature Page

The State administrator must sign and date the SQSP Signature Page. By signing the Signature Page, the State administrator certifies that the State will comply with all the assurances and activities contained in the SQSP guidelines.

Though a State needs to submit the complete SQSP package on a 2-year cycle, there are certain documents contained in the SQSP package which are required to be submitted by States annually as part of the off-year submission. The documents which are required to be submitted annually are considered a modification to the complete SQSP submitted the previous year. Since funds for State UI operations are appropriated each year, each State is required to annually submit the transmittal letter, budget worksheets, organizational chart and the signature page. The modification may also include CAPs for new identified performance deficiencies, and any required modifications to existing CAPs.

Since the UI program is a required one-stop partner, States have the option of including UI in the Combined State Plan authorized by WIOA sec. 103.

This Unemployment Insurance State Quality Service Plan (SQSP) is entered into between the Department of Labor, Employment and Training Administration, and Rhode Island Department of Labor and Training

The Unemployment Insurance SQSP is part of the State’s overall operating plan and, during this Federal fiscal year, the State agency will adhere to and carry out the standards set forth in Federal UI Law as interpreted by the DOL, and adhere to the Federal requirements related to the use of granted funds.

All work performed under this agreement will be in accordance with the assurances and descriptions of activities as identified in the SQSP Handbook and will be subject to its terms.

TYPED NAME AND TITLE: Matthew D. Weldon, Director

SIGNATURE: Matthew D. Weldon

DATE: 10/11/2023

#### b. Requirements for States electing to include UI in the Combined State Plan

States that elect to include UI in the Combined State Plan must:

##### 1. Submit an SQSP in the following manner depending on their timing in the SQSP cycle:

###### A. If a State is in the first year of their 2-year cycle, the State is required to submit the most recently approved complete SQSP package. A complete SQSP package will include the Transmittal Letter, Budget Worksheets/Forms, State Plan Narrative, CAPs (including the milestones and the completion date for each milestone), the UI IAP, Organizational Chart, and the SQSP Signature Page. One of the key goals for the UI program is to ensure that claimants are able to successfully return to work. As such, the SQSP State Plan Narrative must provide a discussion of the plan coordination with other WIOA Combined Plan programs to ensure a coordinated effort and integrated service delivery.

Please see submitted items above.

###### B. If a State is in the second year of the 2-year cycle, the State is required to submit the most recently approved complete SQSP package with a modification that must include the Transmittal Letter, Budget Worksheets/Forms, Organizational Chart, and the SQSP Signature page. The modification may also include CAPs for new identified performance deficiencies, and any required modifications to existing CAPs. The CAP must list both specific milestones for key corrective actions or improvement activities, and the completion date for each milestone.

N/A

##### 2. Submit the required off-year SQSP components as a modification to the Combined State Plan on the same cycle as the regular SQSP process which must be approved by September 30th each year

Please see submitted items above.

### 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.)

Rhode Island employment is to increase by 56,130 (11.4%) from its 2020 pandemic employment level. According to the most recent data available; of Rhode Island’s 916,019 working age residents, approximately 315,157 (34.4%) were aged 55 and older in 2022. Nationally, 37.1 percent of the US working age population is aged 55 and older. Rhode Island had a larger percentage of working age residents aged 55-64 (16.8%) than the national average (15.6%) and also aged 65 and older (22.5%) than the national average (21.5%).   The total share of the entire state population over the age of 55 will grow from 32% in 2022 to 35% by the year 2040.

The occupational groups projected to grow at the fastest rates include Food Preparation & Serving Related occupations (29.6%), Personal Care & Service occupations (22.1%), Transportation & Material Moving occupations (19.0%), Computer & Mathematical occupations (16.1%), Construction & Extraction occupations (15.5%) Healthcare Support occupations (15.3%), and Management occupations (13.9%). These occupational groups are expected to generate nearly 32,000 new jobs during the 2020 – 2030 Projection Period. Throughout this program year, Rhode Island has focused on recruiting additional Host Agency opportunities of projected high economic growth to support contextualized training opportunities for SCSEP participants that match industry demand.

**Rhode Island Industry Projections by Economic Sector**

|  | 2020 | 2030 |  |  |
| --- | --- | --- | --- | --- |
|  | **Average** | **Projected** | **Numeric** | **Percent** |
|  | **Employment** | **Employment** | **Change** | **Change** |
| Statewide | 491,000 | 547,130 | 56,130 | 11.4 |
| Food Preparation & Serving Related | 38,214 | 49,501 | 11,925 | 29.6 |
| Personal Care & Service | 13,255 | 16,178 | 2,923 | 22.1 |
| Transportation & Material Moving | 29,953 | 35,654 | 5,701 | 19.0 |
| Computer & Mathematical | 16,244 | 18,864 | 2,620 | 16.1 |
| Construction & Extraction | 20,716 | 23,930 | 3,214 | 15.5 |
| Healthcare Support | 24,460 | 28,206 | 3,746 | 15.3 |
| Management | 22,776 | 25,949 | 3,173 | 13.9 |

**Occupational Outlook**

Rhode Island employment is projected to reach 547,130 in 2030, an increase of 56,130 (11.4%) from its 2020 pandemic employment level.

The occupational groups projected to grow at the fastest rates include Food Preparation & Serving Related occupations (29.6%), Personal Care & Service occupations (22.1%), Transportation & Material Moving occupations (19.0%), Computer & Mathematical occupations (16.1%), Construction & Extraction occupations (15.5%) Healthcare Support occupations (15.3%), and Management occupations (13.9%). These occupational groups are expected to generate nearly 32,000 new jobs during the 2020 – 2030 Projection Period.

The 2020–2030 projections are developed using models based on historical data, which in this set of projections cover the time period through 2020; all input data therefore includes the pandemic. The 2020-2030 data set is the most recent data available at this time.

|  | Employment | Employment |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
|  | **2020** | **2030** | **Change** | **Exits** | **Transfers** | **Growth** | **Total** |
| Statewide, All Occupations | 491,000 | 547,130 | 11.4 | 222,641 | 335,114 | 56,130 | 613,885 |
| Management Occupations | 22,776 | 25,949 | 13.9 | 5,925 | 13,153 | 3,173 | 22,251 |
| Business & Financial Operations Occupations | 35,061 | 39,041 | 11.4 | 9,882 | 21,477 | 3,980 | 35,339 |
| Computer & Mathematical Occupations | 16,244 | 18,864 | 16.1 | 3,603 | 8,666 | 2,620 | 14,889 |
| Architecture & Engineering Occupations | 8,461 | 9,295 | 9.9 | 2,034 | 4,128 | 834 | 6,996 |
| Life, Physical, & Social Science Occupations | 3,956 | 4,359 | 10.2 | 841 | 2,595 | 403 | 3,839 |
| Community & Social Service Occupations | 9,387 | 10,534 | 12.2 | 3,335 | 6,581 | 1,147 | 11,063 |
| Legal Occupations | 6,047 | 6,728 | 11.3 | 1,727 | 2,411 | 681 | 4,819 |
| Education, Training, & Library Occupations | 31,400 | 33,804 | 7.7 | 13 ,825 | 15,072 | 2,404 | 31,301 |
| Arts, Design, Entertainment, Sports, & Media Occupations | 9,522 | 10,822 | 13.7 | 3,722 | 6,391 | 1,300 | 11,413 |
| Healthcare Practitioners & Technical Occupations | 37,057 | 39,446 | 6.5 | 9,431 | 10,598 | 2,389 | 22,418 |
| Healthcare Support Occupations | 24,460 | 28,206 | 15.3 | 15,503 | 16,121 | 3,746 | 35,370 |
| Protective Service Occupations | 11,724 | 13,317 | 13.6 | 6,728 | 8,244 | 1,593 | 16,565 |
| Food Preparation & Serving Related Occupations | 38,214 | 49,509 | 29.6 | 31,832 | 44,149 | 11,295 | 87,296 |
| Building & Grounds Cleaning & Maintenance Occupations | 19,781 | 22,182 | 12.1 | 11,546 | 15,448 | 2,401 | 29,395 |
| Personal Care & Service Occupations | 13,255 | 16,178 | 22.1 | 9,052 | 11,296 | 2,923 | 23,271 |

|  | Employment | Employment |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Sales & Related Occupations | 45,953 | 49,584 | 7.9 | 24.945 | 37,801 | 3,631 | 66,377 |
| Office & Administrative Support Occupations | 61,475 | 61,262 | -0.4 | 29,606 | 37,710 | -213 | 67,103 |
| Farming, Fishing, & Forestry Occupations | 778 | 867 | 11.4 | 352 | 915 | 89 | 1,356 |
| Construction & Extraction Occupations | 20,716 | 23,930 | 15.5 | 6,601 | 14,897 | 3,214 | 24,712 |
| Installation, Maintenance, & Repair Occupations | 16,787 | 18,771 | 11.8 | 5,630 | 11,356 | 1,984 | 18,970 |
| Production Occupations | 27,993 | 28,828 | 3.0 | 11,174 | 20,287 | 835 | 32,296 |
| Transportation & Material Moving Occupations | 29,953 | 35,654 | 19.0 | 15,347 | 25,818 | 5,701 | 46,866 |

**High Demand Occupations**

The current occupations with the highest total are anticipated to be in demand over the projection period. The occupations listed below are projected to have over 341,760 job openings and account for sixty percent (61.4%) of the total openings through 2030. For most of the occupations listed, the need to replace workers leaving an occupation is projected to create more openings than openings created by new/expanding businesses. This allows for increased opportunity for workers with non-traditional career pathways such as SCSEP participants to fill these critical in demand roles.

**Rhode Island High Demand Occupations by Annual Openings 2020 – 2030**

Occupation Total

| Occupational Title | Growth |
| --- | --- |
| Cashiers | 22,916 |
| Retail Salespersons | 17,565 |
| Waiters & Waitresses | 17,662 |
| Fast Food & Counter Workers | 18,941 |
| Office Clerks, General | 11,073 |
| Nursing Assistants | 12,579 |
| Laborers & Freight, Stock & Material Movers, Hand | 12,155 |

| Occupational Title | Growth |
| --- | --- |
| Customer Service Representatives | 11,072 |
| Home Health & Personal Care Aides | 12,203 |
| Janitors and Cleaners | 9,910 |
| Landscaping & Groundskeeping Workers | 7,894 |
| Cooks, Restaurant | 9,219 |
| Stock Clerks & Order Fillers | 8,992 |
| Landscaping & groundskeeping Workers | 7,894 |
| Registered Nurses | 7,411 |
| Bartenders | 6,850 |
| Bookkeeping, Accounting & Auditing Clerks | 6,698 |
| Secretaries & Administrative Assistants | 5,788 |
| Maids & Housekeeping Cleaners | 8,099 |
| General & Operations Managers | 4,962 |
| First-Line Supervisors of Food Preparation & Serving Workers | 5,582 |
| Receptionists and Information Clerks | 5,555 |
| Childcare Workers | 4,048 |
| Sales Representatives, Wholesale & Manufacturing (Except Technical & Scientific Products) | 5,834 |
| First-Line Supervisors of Retail Sales Workers | 5,481 |
| Light Truck or Delivery Services Drivers | 4,598 |
| Carpenters | 4,109 |
| Teacher Assistants | 3,771 |
| Accountants & Auditors | 5,737 |
| First-Line Supervisors: Office & Administrative Support Workers | 3,780 |
| Food Preparation Workers | 6,100 |
| Cooks, Fast Food | 6,495 |
| Software Developers & Software Quality Assurance Analysis & Tester | 4,141 |
| Maintenance and Repair Workers, General | 4,962 |
| Construction Laborers | 4,970 |
| Management Analysts | 5,034 |

| Occupational Title | Growth |
| --- | --- |
| Dishwashers | 3,182 |
| Heavy & Tractor-Trailer Truck Drivers | 5,265 |
| Security Guards | 4,648 |
| Dining Room & Cafeteria Attendants & Bartender Helpers | 4,228 |
| School Bus Monitors & Protective Service Workers, All Other | 4,108 |
| Hairdressers, Hairstylists & Cosmetologists | 3,798 |
| Electricians | 3,166 |
| Passenger Vehicle Drivers (Except Bus Drivers, Transit & Intercity) | 3,976 |
| Human Resource Specialist | 2,487 |
| Secondary School Teachers (Except Special & Career/Technical Education) | 3,054 |
| Medical Assistants | 3,768 |
| Market Research Analysts & Marketing Specialists | 3,695 |
| Automotive Service Technicians & Mechanics | 3,055 |
| First-Line Supervisors of Production & Operating Workers | 2,348 |
| Social & Human Service Assistants | 3,726 |
| Sales Representatives of Service (Except Advertising, Insurance, Financial Service, Travel) | 3,112 |
| Amusement & Recreation Attendants | 2,980 |
| Elementary School Teachers, Short-Term | 2,942 |
| Substitute Teachers, Short-Term | 2,939 |
| Driver/Sales Workers | 2,763 |
| Bakers | 2,458 |
| Shipping, Receiving, & Traffic Clerks | 2,426 |
| Food Servers, Non-Restaurant | 2,344 |
| Fitness Trainers and Aerobic Instructors | 2,340 |
| Insurance Sales Agents | 2,252 |

**Opportunities for Older Workers**

Rhode Island businesses are continuing to hire older workers here in Rhode Island. Nationally the civilian labor force participation rate for those 55-64 was 66.4%, where Rhode islands was 70.8%. Rhode Island employers have seen the value and the cost savings that can be credited to employing individuals with years of work experience. Rhode Island’s largest and/or growing industries continue to provide several opportunities for employers who are expected the background and knowledge that older workers can provide.

Cashiers/ Retail Salespersons are the two occupations with the expected high growth by annual openings through 2030, and also where workers containing patience and experience working with the general public can be a significant value to employers. Education Services, and Healthcare are two additional areas where there is a continued need for experienced, knowledgeable, and talented older workers.  Rhode Island’s large tourism and hospitality industries also are areas that may provide employment opportunities for workers of age. For older workers with business, office and professional experience/background, occupations such as Bookkeeping, Accounting, & Auditing Clerks, as well as Secretaries & Administrative Assistants, represent additional opportunities for employment.

##### 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))

According to the Rhode Island Department of Labor and Training’s Labor Market Information (RI DLT LMI) Unit, the following industries are projected to rank among the fastest growing from 2020 to 2030: Food Preparation & Serving Related occupations (29.6%), Personal Care & Service occupations (22.1%), Transportation & Material Moving occupations (19.0%),  Computer & Mathematical occupations (16.1%), Construction & Extraction occupations (15.5%) Healthcare Support occupations (15.3%), and Management occupations (13.9%). These occupational groups are expected to generate nearly 32,000 projected jobs. As previously mentioned, Rhode Island currently has a larger percentage of working age residents aged 55-64 than the national average and a larger percentage aged 65 and older than the national average (21.5%) – a share of older workers that is projected to grow even larger in the next two decades. The imperative for Rhode Island to retain and retrain its older population for employment will arguably be stronger in Rhode Island than in other states.

Rhode Island supports unsubsidized employment for SCSEP participants through a holistic focus that begins with ensuring that participants are placed in Host Agency training opportunities that not only connect with participant’s transferable skill set, but that are aligned with high growth occupations that would offer the most opportunity for success.  Rhode Island’s SCSEP counselors are also cross trained WIOA Title I and Title III staff which ensures that there is dedicated job search assistance available throughout the SCSEP placement.  Given the projected openings as compared to growing population of older workers; skills training would likely focus on general work readiness skills, time management, teamwork, communication, recordkeeping, problem solving and cultural and linguistic awareness, which would benefit jobseekers in an increasingly diverse economy.

The Rhode Island SCSEP program has had success in providing Rhode Island SCSEP participants with training in the “supportive services” to the above industries. RI SCSEP Past trainings and job placements have included positions such as Food Preparation and Service; Education, Trainings (computer literacy), Office and Administrative Support; Maintenance and Custodial Services; Community and Social Services; Management. RI has had success with this strategy, and it has been proven to be effective in providing SCSEP participants with the tools necessary to find unsubsidized employment. RI will continue to follow current trends in Rhode Island economic growth to ensure SCSEP participants are receiving up to date trainings and experience that best ensures a streamlined transition to unsubsidized employment.

##### 3. Discuss current and projected employment opportunities in the State (such as by providing information available under §15 of the Wagner-Peyser Act (29 U.S.C. 491-2) by occupation), and the types of skills possessed by eligible individuals. (20 CFR 641.325(c))

**Statewide Occupations with the Highest Projected Openings 2020-2030, with Education and Training Requirement**

| CODE | Title | Total Openings | Typical Education | Job Training |
| --- | --- | --- | --- | --- |
| 41-  2031 | Retail Salespersons | 17,565 | No formal educational credential | Short-term on- the-job training |
| 35-  3031 | Waiters and Waitresses | 17,662 | No formal educational credential | Short-term on- the-job training |
| 35-  3021 | Food Preparation | 6,100 | No formal educational credential | Short-term on- the-job training |
| 41-  2011 | Cashiers | 22,916 | No formal educational credential | Short-term on- the-job training |
| 43-  4051 | Customer Service Representatives | 11,072 | High school diploma or equivalent | Short-term on- the-job training |
| 31-  1014 | Nursing Assistants | 12,664 | Postsecondary non- degree award | None |
| 43-  9061 | Office Clerks, General | 11,073 | High school diploma or equivalent | Short-term on- the-job training |
| 37-  2011 | Janitors and Cleaners, Except Maids and Housekeeping Cleaners | 9,910 | No formal educational credential | Short-term on- the-job training |
| CODE | Title | Total Openings | Typical Education | Job Training |
| 53-  7065 | Stockers and Order Fillers | 8,221 | High school diploma or equivalent | Short-term on- the-job training |
| 53-  7062 | Laborers and Freight, Stock, and Material Movers, Hand | 12,155 | No formal educational credential | Short-term on- the-job training |

Reflecting the top occupations with the highest projected openings. occupationally specific skills include:

SOC | Title and description

41-2031 Retail salespersons, Training may include, POS training, inventory management, customer service skills, and specific product training for the type of retail store they are working in

35-3031 Waiters and waitresses, Training may include, product information, what is in the product and how it is made.  Customer service training, appropriate communication with other staff and customers and computer training.

35-3021 Combined food preparation and serving workers, including fast food, Training may include, specific food prep, food safety training, customer service training and POS training.

41-2011 Cashiers, Customer services training, POS training, computer training.

43-4051 Customer service representatives, The training may include, how to work with people of all back grounds, how to talk professionally on the telephone, how to address people and Microsoft computer skills

**Statewide Vocational Training Occupations with the Highest Projected Number of Openings 2020-2030**

| CODE | Title | Total Openings | Typical Education | Job Training |
| --- | --- | --- | --- | --- |
| 35-  2014 | Cooks, Restaurant | 9,219 | No formal educational credential | Moderate-term on-the-job training |
| 43-  3031 | Bookkeeping, Accounting, and Auditing Clerks | 6,698 | Some college, no degree | Moderate-term on-the-job training |
| 41-  4012 | Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products | 5,834 | High school diploma or equivalent | Moderate-term on-the-job training |
| 49-  9071 | Maintenance and Repair Workers, General | 4,962 | High school diploma or equivalent | Moderate-term on-the-job training |
| 51-  2092 | Miscellaneous Assemblers and Fabricators | 2,043 | High school diploma or equivalent | Moderate-term on-the-job training |
| 43-  6013 | Medical Secretaries | 2,069 | High school diploma or equivalent | Moderate-term on-the-job training |
| 51-  4121 | Welders, Cutters, Solderers, and Brazers | 1,984 | High school diploma or equivalent | Moderate-term on-the-job training |
| 41-  3021 | Insurance Sales Agents | 2,252 | High school diploma or equivalent | Moderate-term on-the-job training |
| 43-  3021 | Billing and Posting Clerks | 2,008 | High school diploma or equivalent | Moderate-term on-the-job training |

 Employment in Rhode Island is projected to grow at all education and skill levels, from jobs requiring less than a high school diploma to those requiring advanced degrees. During the 2020-2030 projection period, it is estimated that employers will need to ﬁnd workers to ﬁll over 56,000 jobs and to replace over 557,000 workers.

Parallel to the national distribution, jobs requiring a high school diploma for entry into an occupation represent the largest portion of the Rhode Island labor market. Thirty six percent (36.0%) of Rhode Island jobs typically require a high school education; slightly lower than the national percentage (38.4%). Between 2020 and 2030, there are over 217,000 openings projected for occupations at this educational level.  This allows for increased opportunity for many SCSEP participants who may not have traditional educational pathways. For many of the above jobs there is an expectation of a degree of on-the-job training. Through intentional Host Agency training and many participants being transitioned to unsubsidized employment at the same Host Agency, some SCSEP participants can begin employment with much of that training already begun, creating a significant benefit for employers.

Jobs requiring college degrees (Associate, Bachelor’s, Master’s or Doctoral) represent nearly a third (32.8%) of the current occupational distribution in Rhode Island, slightly higher than the national average (30.1%). During the projection period it is estimated that there will be more than 144,000 openings for occupations requiring a minimum of an associate degree in Rhode Island.

| Education Level | 2020 | 2030 | Exits | Openings Due To Transfers | Growth | Total Openings |
| --- | --- | --- | --- | --- | --- | --- |
| Doctoral or professional degree | 19,612 | 20,800 | 5,250 | 5,492 | 1,188 | 11,930 |
| Master's degree | 11,330 | 12,424 | 3,528 | 5,426 | 1,094 | 10,048 |
| Bachelor's degree | 118,822 | 131,959 | 34,277 | 63,662 | 13,137 | 111,076 |
| Associate degree | 11,071 | 12,361 | 3,805 | 6,483 | 1,290 | 11,578 |
| Postsecondary non-degree award | 35,084 | 38,704 | 16,320 | 22,226 | 3,620 | 42,166 |
| Some college, no degree | 12,254 | 12,946 | 5,898 | 6,443 | 692 | 13,033 |
| High school diploma or equivalent | 175,684 | 190,974 | 78,789 | 123,590 | 15,290 | 217,669 |
| No formal educational credential | 107,143 | 126,962 | 74,774 | 101,792 | 19,819 | 196,385 |

Prior work experience in a previous occupation is required for thirteen percent of the occupations in the workforce.

| Typical Work Experience Needed | 2020 | 2030 | Exits | Openings Due to Transfers | Growth | Total Openings |
| --- | --- | --- | --- | --- | --- | --- |
| Grand Total | 491,000 | 547,130 | 222,641 | 335,114 | 56,130 | 613,885 |
| 5 years or more | 18,191 | 20,525 | 4,893 | 10,807 | 2,334 | 18,034 |
| Less than 5 years | 46,436 | 54,091 | 18,025 | 32,417 | 7,655 | 58,097 |

| Typical Work Experience Needed | 2020 | 2030 | Exits | Openings Due to Transfers | Growth | Total Openings |
| --- | --- | --- | --- | --- | --- | --- |
| None | 426,373 | 472,514 | 199,723 | 291,890 | 46,141 | 537,754 |

Occupational distribution of the typical on-the-job training needed to attain competency for Rhode Island occupations.

| Typical Education Needed For Job | 2020 | 2030 | Exits | Openings Due to Transfers | Growth | Total Openings |
| --- | --- | --- | --- | --- | --- | --- |
| Internship/residency | 8,474 | 8,834 | 1,836 | 2,389 | 360 | 4,585 |
| Apprenticeship | 9,118 | 10,434 | 2,834 | 6,621 | 1,316 | 10,771 |
| Long-term on-the-job training | 17,764 | 19,527 | 6,515 | 11,178 | 1,763 | 19,456 |
| Moderate-term on-the-job training | 79,297 | 86,241 | 30,295 | 53,246 | 6,944 | 90,485 |
| Short-term on-the-job training | 181,165 | 205,385 | 114,573 | 154,213 | 24,220 | 293,006 |
| None | 195,182 | 216,709 | 66,588 | 107,467 | 21,527 | 195,582 |

Rhode Island continues to focus on SCSEP participant training opportunities that encourage essential skills growth. For almost a decade, the National Association of Colleges and Employers has surveyed employers about their most-wanted skills. Invariably, the emotional intelligence and  transferable skills are those that employers report as adding significant value. These skills combined with the projected growth in employment opportunities that require a high school diploma, allows SCSEP participants an opportunity to seamlessly backer-enter   the workforce upon receiving training and support while in the program.

#### 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))

The RI DLT is a partner in the One-Stop Delivery System, including the American Job Centers (AJC’s). The RI DLT has a Memorandum of Understanding (MOU) with both of Rhode Island’s local area workforce development boards. RI DLT’s SCSEP job coaches are also cross trained Title I/Title III merit staff. Where applicable, SCSEP participants are given the opportunity to access trainings and services through WIOA title I programs. SCSEP information is shared with the Job Centers, such as program eligibility requirements and priorities, open training slots, and workshop information. In addition, information is shared regarding the fastest growing industries, occupations and businesses that offer appropriate job opportunities for SCSEP participants. Also, SCSEP marketing materials, such as pamphlets (including bilingual materials) are placed at the Job Centers and updated and replenished during frequent visits. SCSEP staff and participants will continue to participate in Job Recruitments at the AJC’s and on the Virtual Career Center. In addition, they will cross flow job market and training information between the AJC’s and SCSEP program staff. RI DLT staff will disseminate information regarding training vacancies and refer potential applicants to the SCSEP program. RI DLT also works with returning citizens who are 55 and older and helps them transition back into the community by enrolling them into SCSEP. Exiting participants will be encouraged to continue their association with the Job Centers. Participants who have reached their individual durational limit for SCSEP services - but who have not yet obtained unsubsidized employment - will be referred to the Job Centers for further job search and training support through WIOA Title I services.

###### 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))

Rhode Island SCSEP collaborates with other Older Americans Act programs, such as the nutrition and health and wellness programs. These partnerships have led to the establishment of effective training assignments that provide much needed services to older Rhode Islanders. Rhode Island SCSEP maintains ongoing coordination with the National SCSEP grantee to guarantee services for all eligible participants within the state. By closely communicating with the National Grantee regarding waitlist management, host agencies, and placements, Rhode Island SCSEP ensures that every eligible SCSEP participant receives optimal services. Rhode Island plans to continue this robust and successful collaboration in the coming years.

###### 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))

The SCSEP program works together and leverages resources with many organizations to provide training and supportive services for the participants. Many of these entities include host training sites, educational organizations to support participants where English is a second language, veteran representatives, vocational rehabilitation activities, and social service agencies. In addition, RI SCSEP coordinates with many agencies to help participants in need of services such as subsidized housing or temporary shelters; no-cost medical and prescription programs; Catholic Charities; energy assistance; food stamps; Supplemental Security Income; reduced fares on transportation; the RI Food Bank; church-provided food and clothing; and nutrition programs provided through the Older Americans Act. For participants who will exit SCSEP without a job, they will continue working with an American Job Center WIOA Title I job coach until they obtain employment. They will continue to have the opportunity to access supportive services as needed and be referred to other local agencies to assist them until they can obtain employment. In the past year Rhode Island increased its Host Agency opportunities, particularly focusing on other public entities, and Community Based Organizations (CBO) in the state. New Host Agencies include the Secretary of State, Public Libraries, Food Banks, Lifespan Health Care Center, and more.

###### D. Planned actions to coordinate SCSEP with other labor market and job training initiatives. (20 CFR 641.302(j))

RI SCSEP will remain a close liaison with the State’s American Job Centers(AJC) to monitor job market trends and opportunities. Working relationships will be maintained with the One-Stops partners including Disability Specialists from the Office of Rehabilitative Services (ORS) and Veteran Representatives. Assessments on Job market information including the Occupation and Industry Projections information will be measured when making training decisions. The AJCs will continue to be consulted as they provide daily support in the transition of SCSEP participants to jobs. SCSEP participants are also kept informed of other training and employment opportunities throughout the state. Rhode Island’s sector partnership economic development platform Real Jobs Rhode Island has myriad trainings that may compliment a Host Agency placement. These sector partnerships train for employer requested skills. When combined with SCSEP opportunities these trainings can ensure full connection to opportunity.

###### 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)

RI SCSEP will continue its collaboration with the One-Stop system, including the American Job Centers and the Providence/Cranston Workforce Development Board. SCSEP program managers and staff are located at the Job Centers and are constantly updated on any new programs, workshops or training that may be of value to participants. SCSEP marketing materials, such pamphlets (including bilingual materials) are placed at the Centers and updated and replenished when necessary. Access to intensive training services will continue to be considered with the above collaborative actions.

###### F. Efforts to work with local economic development offices in rural locations.

According to the SCSEP final rule where rural is defined as “areas not designated as a metropolitan statistical area by the Census Bureau; segments within metropolitan counties identified by codes 4 through 10 in the Rural Urban Commuting Area (RUCA) system; and RUCA codes 2 and 3 for census tracts that are larger than 400 square miles and have populations density of less than 30 people per square mile”, there do not exist in Rhode Island any communities that are considered rural communities.

##### 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.)

RI SCSEP continues to emphasize actions that transition participants to successful unsubsidized employment. SCSEP management updated its policies and procedures to ensure SCSEP participates are receiving every opportunity  with supportive services and training to obtain unsubsidized employment. A substantial portion of that effort goes towards establishment working relationships with the organizations that hire SCSEP participants and in establishing new relationships with potential employers.  Program staff develops job leads and identifies potential employers in the public and private sectors by advertising job postings, offering job fairs, and contacting employers (in person, by telephone, virtually, and email). The Program will continue to use the American Job Centers to access various job search sites in an effort to identify job opportunities for SCSEP participants.

The SCSEP relationship with the American Job Center will continue to be maintained and improved. Program managers and staff are always in communication with one another around potential job leads and trainings. Once SCSEP participants have been transitioned to his or her unsubsidized job, follow ups will be completed with the successful participant and his or her new workplace to facilitate long term unsubsidized employment.

The Rhode Island SCSEP program will follow up with employers who have hired participants in the past to show goodwill and potential future job prospects. Follow-up activities that are required by program regulations, as well as maintaining strong relationships with employers will increase the possibility of retention and allow employers to communicate with SCSEP management if additional jobs become available. Prior to having a SCSEP participant apply for a job, staff will ensure they are prepared for interviews and have all the skills necessary for that position.  This practice will enforce good job retention and employer relations, which will build confidence with employers to hire future SCSEP participants. Employers will be informed of federal and state hiring incentives on all hires. Most SCSEP participant accepts only part-time employment with daytime hours during the normal work week. Thus, the program mostly targets community service organizations and small businesses, since these employers primarily offer the types of jobs that SCSEP participants are seeking. Typically SCSEP participants are unwilling to relocate or travel far which means the program focuses on the local, community job markets. With remote or hybrid employment continuing to be the trend, the SCSEP program will continue to push for digital literacy skills for SCSEP participants to better support the vast selection of employment options that may be available. A significant portion of the Program’s unsubsidized placements occur when the host training sites hire the SCSEP participants that are assigned to them. SCSEP program manager has done an outstanding job targeting host agencies in communities where our SCSEP participants live. RI SCSEP has onboarded several new host agencies that are in communities of need to help support our participants. Program managers and staff will continue to routinely visit host training sites to encourage them to hire their assigned SCSEP participants when there are job openings and available funds. The value and benefits of hiring their SCSEP trained participants will continue to be emphasized.

##### 3. The State’s long-term strategy for serving minority older individuals under SCSEP. (20 CFR 641.302 (c))

Historically, the majority of participants in RI SCSEP have been minority individuals. For example, the most recent U.S. DOL SCSEP minority report indicates that the state’s overall incidence of all minorities in the population was 38.4% while the SCSEP enrollment percentage is 56.5%. RI SCSEP has emphasized and will continue to focus on minority enrollments. RI SCSEP enrollment levels for minorities in PY 2023 have been positive. For example, the

percentage of minority enrollees in the Program Year 2023 thus far total 60%; and the Hispanic enrollment level is around 20%. RI SCSEP will continue to recruit the minority population in many ways, such as: (1) continuing contacting community agencies, minority churches, faith based organizations and organizations that serve multi-cultural populations; (2) assigning participants to host training sites which serve and communicate with the minority population; (3) encourage all participants, including minority individuals, to make program referrals for family, friends, and other contacts.

##### 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)

The Program views the distribution of community service needs across the State as being in-line with the equitable distribution of program-eligible individuals.

1. Communities in Need:

The following list based on the most data available identifies those localities for which projects of the type authorized by Title V are most needed (20 CFR 641.325 (d).) These areas are where both the most recent annualized unemployment rate and poverty rate exceeded the state average.

| City/Town | Unemployment (2023) | Poverty Rate (2021) |
| --- | --- | --- |
| Woonsocket | 4.1% | 19.2% |
| Providence | 3.5% | 21.3% |
| Central Falls | 3.5% | 24.4% |
| Pawtucket | 3.5% | 13.7% |

SCSEP will continue to focus efforts in the areas of greatest needs based on the unemployment rate and occurrences of poverty. To better serve individuals with a priority for service, the Department of Labor and Training works closely with the Department of Human Services, the Department of Behavioral Health, Development Disabilities and Hospitals, and the Office of Healthy Aging (formerly the Division of Elderly Affairs).

1. Needs of Individuals:

Many SCSEP participants are in need of various supportive services. RI SCSEP has updated policies increase the support of the needs of individuals. SCSEP management explain in great detail the benefits one can receive while in the SCSEP program. SCSEP staff continually put participants  in the best position to obtain and retain unsubsidized jobs. When the need is job-related, SCSEP management will meet with the Participant’s training site supervisor and devise a plan for moving forward to ensure success. If the subgrantee cannot satisfy a Participant’s personal or social need, there will be access to a full array of services through information and referral networks and procedures. Services include legal assistance, health care agencies, educational opportunities, Social Security benefits; and, clothing, housing, home heating fuel and transportation assistance. In addition, incidentals necessary for training site assignments (e.g., safety glasses, work shoes, etc.) will be obtained by referral to social agencies that may provide them without charge.

1. Community Services and Supportive Services:

The work of collecting, monitoring, and analyzing community service needs is an ongoing process. SCSEP’s service to a community is based mostly on the social and economic needs of the participants entering the program; and, on the demand for services within local communities. The Greater Rhode Island policy governing supportive services provision through the Workforce Innovation and Opportunity Act (WIOA) was updated to include, but not limited to ,childcare assistance, healthcare/medical assistance, background checks, license-related cost, books, emergency housing assistance, emergency utility assistance, tools, equipment and uniforms, job search allowances, legal aid services and transportation assistance. Rhode Island DLT recognized that a greater emphasis on supportive services was needed. As the State focuses on the need for more comprehensive services, the Governor’s Workforce Board implemented additional policies and procedures that increased the dollar amount of supportive services that a participant could receive.  SCSEP job coaches meet with each participant to go over the array of supportive service that are available to them. Supportive services such as transportation assistance and clothing assistance are common services that are requested. Other commonly requested supportive services that our job coaches come across includes tools and equipment, such as laptops to aid participants in their assignments or job placements and housing assistance.

The selection of possible training sites is accomplished through community outreach efforts, such as through meetings with current and potential host training sites, which can determine where the highest needs for SCSEP assignments exist. Efforts also include constant communication with the Job Centers and Rhode Island’s Division of Elderly Affairs to monitor community needs. RI SCSEP maintains relationships with area non-profit agencies that provide a wide range of services, including adult day programs, child day care, food services, recreational facilities, health care, and social services. The current focus is on community service needs being supported through the state’s network of senior centers, state service centers, housing agencies, shelters, and childcare facilities.

RI SCSEP is always looking to expand the reach of SCSEP throughout the State. For example, SCSEP management made a big push to recruit and onboard additional community service training sites in RI to complement the existing sites. Existing sites include Amos House; Centro De Innovacion Latina Project Weber Renew; YMCA; State of Rhode Island; DARE, and Better Lives RI. Within the last year RI SCSEP has added around twenty (20) new host agency and we will continue to go into communities to find entities that can help improve the program while providing pivotal training to our participants.

Rhode Island DLT recognized that a greater emphasis on supportive services was needed. As the State focuses on the need for more comprehensive services, the Governor’s Workforce Board  implemented additional policies and procedures that increased the dollar amount of supportive services that a participant could receive.

In additional programs including SCSEP assure participants they have full access to the services they need in a timely manner.

##### 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))

RI SCSEP has been consistently successful for many years in providing work experience, supportive services, and job search assistance to Older Workers, and in assigning productive trainees to community service agencies that meet their needs. This Program has helped senior Rhode Islanders become job-ready and confident to reenter the workforce - while providing employers with trained and devoted individuals. The Rhode Island Department of Labor and Training serves three counties. The distribution of authorizations is based on the Equitable Distribution as provided by U.S. DOL, which identifies each County’s percentage of the state’s program-eligible population. The Program Year 2023 grant funds 44 authorizations and 23 modified positions across the state, according to the following allocations: Bristol County – 3 slots; Kent County –4 slots; Providence County – 16 slots.

Since 2017, RI SCSEP has been operated by the Rhode Island Department and Labor and Training. SCSEP has been administered by RIDLT through the Chief of Labor and Training Operations overseeing the program in its entirety with a Coordinator of Employment and Training Programs overseeing the day-to-day operations. This change in program operator has allowed RI SCSEP to focus on building stronger partnerships with Job partners as SCSEP staff are co-located in the Job Centers. Participants are able to access Job Center partner programs like Wagner-Peyser and WIOA through their SCSEP counselor, as well as the Department’s comprehensive approach to supportive services. This past year SCSEP management improved its policies and procedures to better assist its participants.  This change has allowed the program to run more effectively as well as provide ample support to the participants providing them the skills, they need to be successful. These changes will allow the RI SCSEP program to achieve higher performance measures than previous years with the overall goal of participants obtaining unsubsidized employment in a shorter time than previous program years. If programmatic adjustments are necessary, the Chief of Labor and Training Operations, alongside the Coordinator of Employment and Training Programs, will collaborate on developing new policies and procedures to align with these changes. Furthermore, comprehensive trainings will be organized for all SCSEP program staff to ensure they are well informed about any necessary adjustments. RI SCSEP would recommend that U.S. DOL continue to increase nationwide outreach so that employers become more aware of SCSEP and its job-ready participants.

##### 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))

1. Targeting Jobs Effectively:

RI SCSEP again has been successful in placing its participants in unsubsidized employment with community service agencies -- especially with host training sites -- and in other service-oriented industries. The most prevalent occupations for SCSEP participants include jobs in maintenance and custodial work; as office clerks and receptionists; childcare workers; senior center program assistants; food service; and, in customer service. The Program focuses on all areas of the state for its SCSEP participants. However, many participants cannot - or prefer not to - have long commutes to and from work; so, all attempts will be made to find local job opportunities to accommodate these needs.

Program managers and staff are in constant communication with community service sites and encourage them to hire their assigned SCSEP participants as funds becomes available. SCSEP staff will continue to reenforce the benefits and values of hiring their SCEP participant. Due to the past successful relationships of the program this will allow onboarding future SCSEP participant to have a successful opportunity. All existing and new community service sites are required to sign a Letter of Agreement that clearly describes the temporary nature of training assignments; and, which emphasizes the site’s responsibility for considering qualified participants for jobs.

1. Working with the Job Centers Effectively:

The Program will continue to partner with the American Job Centers to monitor information on job openings and trends that will help identify current and future regional job opportunities. Information will be tracked regarding the fastest growing industries and the occupations and businesses that offer appropriate job opportunities for SCSEP participants. Rhode Island SCSEP will continue to enhance future coordination working with the Rhode Island DLT’s employer engagement team to identify previously untapped job market in local areas.

1. Managing Durational Limits Effectively:

The Rhode Island SCSEP Program will continue to provide quality support to each participant who is nearing their SCSEP durational limit (e.g., not employed after 48 months in the program). Rhode Island will continue to  ensure awareness  of individual durational limit requirements; transitional planning and scheduling; conducting assessments; preparing and implementing transitional Individual Employment Plans; researching the local job market; and, on accessing all supportive services available to assist the SCSEP participants. When a participant receives an assessment 12 months before their durational limit date, a transitional Individual Employment plan  (IEP) is developed and initiated. , A

reassessment will be finalized six months before the individual’s durational limit date (or sooner, if needed); and his or her transitional IEP will be updated during the reassessment.  For participants who have gained good or reasonable job potential with, transitional IEP actions may include updating resumes and interviewing skills; increasing job development and training efforts; and/or making rotations to other Host Agencies if requested, to gain additional skills. In addition, to foster good employer relations during the transition process, emphasis will be placed on sending qualified and suitable participants to each job interview.

1. Training Participants Effectively:

Participant training is essential for successful program performance. The following training activities are ongoing and will continue to be emphasized:

* 1. On top of providing quality work experience, the host training sites will be highly encouraged to make essential in-service and on-the-job training available for their assigned SCSEP participants. RI SCSEP has seen this enhance effectiveness in the current assignment, and better prepare the participants for unsubsidized employment. Training will coincide with each participant’s assessment and Individual Employment Plan. Also, digital literacy training and experience will continue to be emphasized and provided at the American Job Centers. In addition, SCSEP will continue to collaborate with the local libraries and non-profit agencies that offer free training.
  2. Participants will be referred to and encouraged to attend workshops at the American Job Centers in person or virtually and with partner agencies, covering different aspects of the job-seeking process and topics relating to health, consumer information, transportation, social security, and retirement security. Workshops include speakers from community service organizations, government agencies, and the local business community.
  3. Participants seeking full time employment - who would improve their potential for transition into unsubsidized employment with skills training - will be encouraged to attend programs offered through WIOA American Job Centers.

#### 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))

In Bristol County a total of 1,117 older residents are living in poverty accounting for 2.48% percent of the county’s older population and 15,390 are living at or above poverty levels, accounting for 34.17% percent of the county’s older population. Within Providence County six cities and towns have more than 1,000 older residents living in or near poverty levels, including Providence (7,176), Pawtucket (2,433), Cranston (1,976), East Providence (1,468), Woonsocket (1,760) and North Providence (1,385). Warwick (2,152, located in Kent County, is the only other Rhode Island cities or towns with more than 1,000 older residents living in or near poverty levels. On a percentage basis, the cities of North Providence (33.4%), Providence (20.97%), Pawtucket (26.4%) and Woonsocket (26.26%), all located in Providence County, have the greatest share of older residents living in or near poverty levels. Demographic data for all individuals living at the poverty level, which accounts for over three quarters of all those living in or near poverty levels, shows that women, both older and total population, are more likely to be living in poverty than men of the same age group. Older women account for 52.49 percent of the older residents living at the poverty level, with older men accounting for 47.6 percent.

Likewise, minority residents 55 and older are more likely to be living in poverty than the non- minority residents 55.

##### 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.

In Rhode Island the SCSEP equitable distribution consists of three (3) slots in Bristol County; four (4) slots in Kent County; and sixteen (16) slots in Providence County.

* Cities located in Bristol County include Barrington, Bristol, and Warren.
* Cities located in Kent County include Coventry, East Greenwich, Warwick, West Greenwich, and West Warwick.
* Cities located in Providence County include Burrillville, Central Falls, Cranston, Cumberland, East Providence, Foster, Glocester, Johnston, Lincoln, North Providence, North Smithfield, Pawtucket, Providence, Scituate, Smithfield, and Woonsocket.

The SCSEP project will take place in each of these three counties and the cities or towns that comprise those counties.

The 16 slots in Providence County are down from previous program years of PY22. This change was due to the increase of minimum wage in RI. On January 1, 2025, Rhode Island’s minimum wage will increase to $15.00 an hour. Positions in the two remaining counties were reduced slightly from previous years.

##### 3. Describe current slot imbalances and proposed steps to correct inequities to achieve equitable distribution.

As of Program Year 2023 Quarter 2, RI SCSEP equitable distribution data indicates that of the 44 authorized slots (unmodified) Kent County is under-enrolled by 3 slots; Bristol County is under- enrolled by 3 slots; and Providence County is under-enrolled by 7 slots. RI minimum wage as of January 2024 is $14.00 per hour. Over the next year minimum wage will increase to a minimum wage of $15.00 an hour. The state’s slots for enrollment are based on participants receiving minimum wage. Many of our SCSEP participants and community service sites are within Providence County, which is why our other counties struggle to fill their slots. RI SCSEP constantly pursues employment for participants to then enroll new individuals in the counties that are most underserved. RI SCSEP employment strategy will include continued efforts to engage local businesses, churches, and agencies/centers that are willing to hire older individuals at a pay that allows for self-sufficiency. We will continue to find community service sites in the underserved communities and bring the resources to them. We recognize the importance of maintaining equitable distribution among the counties we serve and will remain hardworking and diligent with training individuals for unsubsidized employment to allow for continued enrollment in the counties.

##### 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.

RI SCSEP strives to provide equitable access to the program in accordance with the percentages of program-eligible residents’ three counties. When there are changes to the ratios, authorizations will be redistributed among the three counties based on the new equitable distribution -- increasing positions where needed and decreasing training slots in over-served counties. However, current participants will not be impacted by any reallocations. RI SCSEP will work with the RI National Grantee to ensure equitable distribution of slots in all counties of Rhode Island to minimize over-serving or underserving locations. If the scenario arises that positions must be transferred to address over-serving or underserving locations, RI SCSEP will ensure to adhere to CFR 641.365 by communicating with the National Grantee, USDOL, and the Federal Project Officer. RI SCSEP will ensure all participants and host agencies are kept informed of the changes.

###### B. Equitably serves rural and urban areas.

Bristol County, Kent County and Providence County are considered urban areas. Within those counties, and according to the SCSEP final rule where rural is defined as “areas not designated as a metropolitan statistical area by the Census Bureau; segments within metropolitan counties identified by codes 4 through 10 in the Rural Urban Commuting Area (RUCA) system; and RUCA codes 2 and 3 for census tracts that are larger than 400 square miles and have populations density of less than 30 people per square mile”, there do not exist any communities that are considered rural communities. Again, training authorizations will follow the equitable distribution percentage for each County.

###### C. Serves individuals afforded priority for service under 20 CFR 641.520. (20 CFR 641.302(a), 641.365, 641.520)

In selecting eligible individuals for participation in the SCSEP, priority is given to individuals who have one or more of the following characteristics as defined in the Older Americans Act section 518(b) (1)-(2) and by the Jobs for Veterans Act: covered persons in accordance with the Jobs for Veterans Act; 65 years of age or older; have a disability; have limited English proficiency or low literacy skills; reside in a rural area; have low employment prospects; have failed to find employment after using services provided through the One-Stop delivery system; formally incarcerated individuals; or are homeless or are at risk of homelessness.

To support employment job coaches in prioritizing participants with significant barriers to employment, RI DLT utilizes a multifaceted approach to reach the hardest to serve. RI DLT assesses and reassesses participants via a face-to-face interview, or a Virtual interview facilitated by the case manager. The assessment covers previous employment history and transferable skills; strengths and barriers; interests and hobbies; educational level; and previous training. RI DLT also uses its relationships with Senior Centers; Churches and Faith Based Organizations; Homeless Shelters; Veteran’s Organizations; Community Food Banks a to help recruit these individuals. Within all enrollment priorities those with poor employment prospects are given preference. These are individuals who are unable to obtain employment without the assistance of SCSEP or other employment and training programs. Those included in this category are individuals who have limited or no work histories; are basic skills deficient; have limited English language proficiency; are displaced homemakers; are disabled; are homeless. The Program views the distribution of priority individuals across the State as being in line with the equitable distribution of program-eligible individuals across the three counties.

##### 5. The ratio of eligible individuals in each service area to the total eligible population in the State. (20 CFR 641.325(a))

RI has one SCSEP Grantee who serves three Counties per the SCSEP equitable distribution as provided by the U.S. Department of Labor, which identifies each county’s percentage of the state’s program-eligible population. In current US census data, out of a Rhode Island civilian labor force of approximately 916,019 (those aged 16 and older) who were either working or actively seeking employment, 34.4%, or 315,157, were aged 55 and older. When delineated by county the numbers are as follows: Bristol County 15,821 (1.7%); Kent County 51,184 (5.5%); Newport County 34,785 (3.8%); Washington County 51,431 (5.61%) and Providence County 161,930 (17.6%). 97.2% of Rhode Islanders aged 55 and older have had their poverty levels determined. Of those individuals, 8.94% are below the poverty level.

##### 6. The relative distribution of eligible individuals who:

###### A. Reside in urban and rural areas within the State

US Census Bureau estimates in 2022 total population for the State of RI at 1,093,734. Of Rhode Island’s 916,019 working age (16+) residents, approximately 315,157 (34.4%) were aged 55 and older in 2022. Delineated by county, the 16+ populations (and corresponding distributions) of those over age 55 are as follows: Bristol County 40,776 (38.8%); Kent County 136,492 (37.5%); Newport County 73,347 (47.4%); Washington County 114,238 (45%) and Providence County 510,822 (31.7%). This population distribution generally corresponds to the percentage of program-eligible Rhode Islanders in each county. Specifically, the three counties are allocated positions and funding based on the Equitable Distribution ratios that are in effect for each grant year (as identified by the U.S. Department of Labor). The ratios for the PY 2021 grant year are Bristol County 13.33%, Kent County 17.78%, and Providence County 68.89%.

###### B. Have the greatest economic need

According to 2016-2020 American Community Survey 5-Year estimates; of the 293,824 Rhode Island residents aged 55 and older, roughly 10% (29,263) live at or below the federal poverty level. Of those 29,263 Rhode Islanders aged 55 and older are estimated to be living below the federal poverty level; 24.6% (7,198) reside in the city of Providence alone;  8.03% (2,351) reside in Pawtucket, 7.99% (2,339) reside in Cranston, and 5.88% (1,721) reside in Woonsocket. These are the top five communities in Rhode Island of older residents facing economic hardship; with each remaining community accounting for less than 5% of the statewide total.

Data for the most recently completed Program Year 2020 indicates that of the total participants served by the state SCSEP program; 94% were below the poverty level and 97% were receiving public assistance.

###### C. Are minorities

In RI, minority residents 55 and older are more likely to be living in poverty than the non- minority residents 55 or older, minority being defined as not white non-Hispanic. There are 9,069 minority residents 55 and older living in poverty. Residents of Black African American decent account for 1,986, residents of Asian descent account for 1,304, residents of American Indian descent account for 179, Native Hawaiian and other Pacific Island descent account for 55,  and the largest segment of the defined non-minority  populous in the census identified as Some Other Race which accounts for 5,545 residents.  Combined, this accounts for 20.75 percent of Rhode Island’s older minority population (43,711) for whom poverty status has been determined.

There are 21,187 non-minority residents 55 and older living in poverty. They account for 2.89 percent of Rhode Island’s older non-minority population (273,664) for whom poverty status has been determined. However, older minority residents numbering 9,069 account for 29.97 percent of the 30,256 older RI residents living in poverty and older non-minority residents numbering 21,187 account for 70.03 percent of the older RI residents living in poverty. RI SCSEP active participants are comprised of 53% minorities which is nearly double the ratio of minority versus non-minorities in RI.

###### D. Are Limited English Proficient

One of the fastest-growing segments of the Rhode Island labor force, adult English language learners face several barriers to employment. According to US Census data, nearly one quarter of Rhode Islanders spoke a language other than English at home, and over 13% of the total state population was foreign born. RI SCSEP currently serves 8% limited English proficient participants and has consistently met need for eligible SCSEP participants in RI. The RI Department of Labor and Training is currently focusing on increasing linguistic diversity in staffing levels, particularly those staff who are serving the community at local Job Centers. In the coming years, these efforts will continue. Additional emphasis on multi-lingual and multi- cultural staff will continue to assure that the needs of historically underserved communities are addressed.

###### E. Have the greatest social need. (20 CFR 641.325(b))

Greatest social need means the need caused by non-economic factors, which include Physical and mental disabilities; language barriers; and cultural, social, or geographical isolation, including isolation caused by racial or ethnic status, which restricts the ability of an individual to perform normal daily tasks or threatens the capacity of the individual to live independently. (42 U.S.C. 3002(24)). According to the U.S. Census Bureau, of the 74,493 individuals aged 18-64 living below poverty, 25.26% have disabilities, while 74.74% do not. However, of the 71,049 individuals aged 18-64 with disabilities, 26.49% live below poverty, while 8.37% of the 564,663 18-64 years old without disabilities live below poverty. Additionally, individuals with disabilities aged 18-64 have an unemployment rate 15.01 percent where those without disabilities have an unemployment rate of 84.99 percent. As mentioned above, English proficiency is also a barrier to employment, however with the small geographic area involved with the state of RI, geographic isolation is not a major barrier. 6.62% of all Rhode Islanders aged 18-64 have a disability and RI SCSEP participants are comprised of 8.7% disabled enrollees. Principal Employment and Training Interviewers along with the Employer Engagement team, will outreach and build strong relationships to community base organizations that serve those with the greatest social needs. RI will continue to receive referrals by community base organizations. Allowing the support necessary to help the participant increase their chances of finding employment.

###### F. Formerly incarcerated individuals, as defined in TEGL 17-20

According to data provided by the Rhode Island Department of Corrections, 18,890 Rhode Islanders were on probation or parole as of December 31, 2020, meaning 1 of every 57 adult residents in Rhode Island is on probation or parole. In Calendar Year 2022, the most recent year for which data was available; there were 1,877 Release events in Rhode Island due to completion of the individuals’ sentence, of whom 1,670 were Male and 207 were Female.  The average age of those released was 35 years old. Note: Rhode Island’s Department of Corrections data tracks sentence completion and release as ‘events’ rather than by unique individual; as there may be individuals who completed more than one sentence and were therefore released more than once in the calendar year. Rhode Island ranks 4th in the nation and 1st in the Northeast in the number of probationers per 100,000 adult residents (data as of 2018). Staff at the American Job Centers outreach and build strong relationships to community base organizations that serve formerly incarcerated individuals. DLT currently works closely with the RI Department of Corrections to work with individuals who are still currently serving time. Rhode Island Title IB staff currently offer services on site in the correctional facilities and communicate closely with the SCSEP staff. SCSEP staff is able to identify potential participants prior to them being released, which allows job coaches to prepare them for their training for when they enter back into the community. RI will continue to receive referrals by community base organizations. Allowing the support necessary to help the participant increase their chances of finding employment.

##### 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))

If positions are needed to be redistributed, RIDLT will ensure clear communication and coordination with Host Agencies, participants, the Federal Project Officer, the National SCSEP grantee, and USDOL. Any positions that require movement will be coordinated with and approved by the Grant Officer. RIDLT will work with participants, host agencies, and the National SCSEP grantee to ensure  a seamless transition as to not disrupt participant wages or interfere with the participants individual employment plan.